

In The Matter Of:

*Senate Committee on Governmental Affairs
Special Investigation*

Deposition of Scott Reed

July 11, 1997

CONFIDENTIAL

CONFIDENTIAL

Miller Reporting Company, Inc.

507 C Street, N.E.

Washington, DC 20002

(202) 546-6666 FAX: (202) 546-1502

*Original File 0711reed.asc, 225 Pages
Min-U-Script® File ID: 0360513814*

Word Index included with this Min-U-Script®

Page 1

UNITED STATES SENATE
COMMITTEE ON GOVERNMENTAL AFFAIRS
In the Matter of:
SPECIAL INVESTIGATION

Washington, D.C.

Friday, July 11, 1997

The deposition of SCOTT REED, called for examination by counsel for the United States Senate, Committee on Governmental Affairs, Room SD-344, Dirksen Senate Office Building, commenced at 9:00 a.m., before Thomas C. Blisko, a notary public in and for the District of Columbia, when were present on behalf of the parties:

APPEARANCES:

On behalf of the Committee on Governmental Affairs:

JEFF ROBBINS, ESQ.

HOWARD SKLAMBERG, ESQ.

DAVID MCKEAN, ESQ.

Counsel, Special Investigation, Minority Staff
United States Senate

Committee on Governmental Affairs

Washington, D.C. 20510

(202) 224-2627

PHILIP J. PERRY, ESQ.

JOHN SPITALERI SHAW, ESQ.

Counsel, Special Investigation, Majority Staff
United States Senate

Committee on Governmental Affairs

Washington, D.C. 20510

(202) 224-2000

On behalf of Deponent Scott Reed:

MARTIN J. WEINSTEIN, ESQ.

Foley & Lardner

Washington Harbour

3000 K Street, N.W.

Washington, D.C. 20007

(202) 672-5435

On behalf of the Republican National Committee:

ALLISON FAHRENKOFF BRIGATI, ESQ.

Deputy Counsel

Republican National Committee

310 First Street, S.E.

Washington, D.C. 20003

(202) 683-8638

Page 2

Page 3

CONTENTS

WITNESS EXAMINATION BY COUNSEL

Scott Reed

By Mr. Robbins	4
By Mr. Sklamberg	200
By Mr. Shaw	224

EXHIBITS

REED DEPOSITION EXHIBITS MARKED

No. 1	87
No. 2	117
No. 3	136
No. 4	144
No. 5	149
No. 6	167
No. 7	185
No. 8	207
No. 9	213

PROCEEDINGS

Whereupon,

SCOTT REED

was called for examination by counsel for the Committee on Governmental Affairs and, having been first duly sworn by the notary public, was examined and testified as follows:

EXAMINATION BY COUNSEL FOR THE MINORITY
COMMITTEE ON GOVERNMENTAL AFFAIRS
BY MR. ROBBINS:

Q: Would you state your full name for the record, please, sir?

A: Scott William Reed.

Q: You understand that you're here to give testimony before this committee, which is charged with investigating certain fund-raising practices?

A: I understand.

Q: And you understand that you're here to testify under oath?

A: I understand that.

Q: And you understand what the implications are of testifying under oath?

A: I understand that.

Q: Have you ever given a deposition before? Have you ever given sworn testimony before?

A: Yes.

Q: How many times?

A: I don't remember. A couple, two or three or four times.

Q: Have you ever given any sworn testimony in connection with your work on behalf of any political committee?

A: No.

Q: Have you ever given sworn testimony in connection with any work that you've done on behalf of any political candidate?

A: No.

Q: Okay. Would you give us a brief resume of your educational background?

MR. WEINSTEIN: Let me jump in, if I can for a second.

MR. ROBBINS: Sure.

MR. WEINSTEIN: I just want to make the record clear that I think I'm not saying that your questions do this, but Mr. Reed is appearing here voluntarily, and as long as the record reflects that you all have not subpoenaed him, he is here voluntarily to do all of those things that you asked about previously. I just want to make sure-

MR. ROBBINS: Yes. I don't have any understanding, however, that that changes the fact that he's here giving sworn testimony under oath.

MR. WEINSTEIN: Absolutely correct.

MR. ROBBINS: Sure.

BY MR. ROBBINS:

Q: Would you give me a brief resume of your educational background, please?

A: Graduated from St. Lawrence University in 1982, upstate New York; attended the Hill School, graduated in 1978, in Pottstown, Pennsylvania.

Q: And what did you do after graduating college?

A: Came to work on Capitol Hill.

Q: For whom?

A: Congressman Tom Evans.

Q: In what capacity?

A: As an intern in his office, and then I worked as a-on his campaign.

Q: And how long did you work for him?

A: Through the election in November of '82.

Q: And then what did you do?

A: Then I worked briefly at the Republican National Committee.

Q: In what capacity?

A: I was a staff assistant to the deputy chairman.

Q: What years or what year?

A: Early 1983.

Q: Okay.

Page 7

(1) A: I then left that and went to Bridgeport,
 (2) Connecticut, where I worked--
 (3) Q: I have no ruling from the Chairman which extends
 (4) that far back to 1983.
 (5) MR. WEINSTEIN: We will do this as background and
 (6) helping to educate you on this witness' background.
 (7) THE WITNESS: Then went to Bridgeport,
 (8) Connecticut, in 1983, worked for Mayor Len Paoletta, ran his
 (9) re-election campaign. After that, in early 1984, I moved to
 (10) Delaware, where I was the executive director of the Reagan-
 (11) Bush campaign for about two months. Then I came down to
 (12) Washington where I was deputy regional campaign director for
 (13) the Reagan-Bush campaign for the Northeast Region.
 (14) After the '84 election, I moved to the RNC where I
 (15) was the regional political director for New England.
 (16) BY MR. ROBBINS:
 (17) Q: For what period of time?
 (18) A: 1985 to 1986. After the 1986 election, I resigned
 (19) from the national committee in January or February and went
 (20) to work for Jack Kemp's campaign for President, 1987 through
 (21) 1988. After the election--
 (22) Q: Your position?
 (23) A: I was the New Hampshire coordinator, then the Iowa
 (24) coordinator. Then after the election in 1988, I went to the
 (25) Department of Housing and Urban Development with Kemp as his

Page 8

(1) executive assistant and his chief of staff. I was there for
 (2) three years, and in early 1992, I resigned the Government
 (3) and I went to work for Tom Evans at a consulting firm, the
 (4) Evans Group.
 (5) Q: Doing what kinds of consulting?
 (6) A: Lobbying and consulting for mostly real estate
 (7) issues. Then in early 1993, I resigned the Evans Group to
 (8) come over to the national committee in probably February.
 (9) Q: The Republican National Committee?
 (10) A: The Republican National Committee.
 (11) Q: February of 1993?
 (12) A: That's right, after Haley was elected chairman, as
 (13) the executive director, where I stayed through February 1,
 (14) 1995, when I resigned from the national committee and went
 (15) to work for Bob Dole as his campaign manager, which ended
 (16) after the election. And then in December or January, last
 (17) year, I started Chesapeake Enterprises, which is my own
 (18) company here in town.
 (19) Q: Who hired you as executive director of the RNC?
 (20) A: Haley Barbour.
 (21) Q: And did he explain to you what your obligations
 (22) were, what your responsibilities were?
 (23) A: Well, as we negotiated what I was going to do, we
 (24) discussed that, yeah.
 (25) Q: And what were the responsibilities?

Page 9

(1) A: I served as the chief operating officer for the
 (2) committee, ran the day-to-day activities.
 (3) Q: As the chief operating officer of the RNC, was
 (4) your sole purpose, as you understood it, to serve the RNC?
 (5) A: Yes.
 (6) Q: So everything that you did in that period of time
 (7) was in service of the Republican National Committee?
 (8) MR. WEINSTEIN: Are you saying the Republican
 (9) National Committee or the chairman of the Republican
 (10) National Committee?
 (11) BY MR. ROBBINS:
 (12) Q: Do you understand my question?
 (13) A: Why don't you ask your question again?
 (14) MR. ROBBINS: Would you read back my question?
 (15) [The reporter read back the requested portion of
 (16) the record.]
 (17) BY MR. ROBBINS:
 (18) Q: Do you understand every word in the question that
 (19) I asked?
 (20) MR. PERRY: Well, let me note that I think that
 (21) question may be misleading to some extent because you
 (22) haven't constrained everything he did in the capacity of
 (23) being paid by the RNC rather than anything that may have
 (24) been in a personal capacity or some other capacity.
 (25) BY MR. ROBBINS:

Page 10

(1) Q: Do you understand my question?
 (2) A: I don't understand.
 (3) Q: What word in it didn't you understand?
 (4) A: Well, let's hear it again and I'll tell you.
 (5) [The reporter read back the requested portion of
 (6) the record.]
 (7) MR. WEINSTEIN: Let me see if I can be a little
 (8) bit helpful. I think I know what you're getting at. He is
 (9) hired by the chairman. The way it works is he's hired by
 (10) the chairman of the Republican National Committee, and so to
 (11) some degree, his service is to the RNC and to the chairman
 (12) of the RNC directly because the chairman of the RNC is his
 (13) boss.
 (14) MR. ROBBINS: Here's the thing, as I think you
 (15) know. The reason that we asked him to testify rather than
 (16) you was to get his answers to questions, as I'm sure you can
 (17) appreciate. And I think the committee probably is more
 (18) interested for the moment in his testimony than in yours.
 (19) BY MR. ROBBINS:
 (20) Q: If there is a word in my question that you didn't
 (21) understand, please tell me. Otherwise, would you answer my
 (22) question?
 (23) A: I served at the pleasure of the chairman of the
 (24) committee.
 (25) Q: You served at the pleasure?

Page 11

(1) A: Yeah.
 (2) Q: Was your purpose to serve, to help him serve the
 (3) RNC?
 (4) A: My pleasure--I served at the pleasure of the
 (5) committee and at the pleasure of the chairman, who hired me.
 (6) Q: Did you do any personal work for Mr. Barbour?
 (7) A: No.
 (8) Q: Did you help him with any of his outside work?
 (9) A: I don't know what outside--what are you talking
 (10) about?
 (11) Q: Well, did you understand you were serving him in
 (12) his capacity as chairman of the Republican Party?
 (13) A: Yes.
 (14) Q: Was there some question in your mind that what you
 (15) were doing during that period of time was working for the
 (16) Republican National Committee?
 (17) A: No, there was no question.
 (18) Q: That was absolutely clear to you?
 (19) A: Yes.
 (20) Q: Serving the purposes of the RNC; correct?
 (21) A: And the chairman.
 (22) Q: Okay. And was there any work that you can think
 (23) of that you did for the chairman that was not also for the
 (24) purpose of helping the RNC?
 (25) A: No.

Page 12

(1) Q: So everything that you can think of that you did
 (2) during that two-year period of time was helping the chairman
 (3) serve the RNC or helping the RNC directly; correct?
 (4) A: Yeah, it was helping the RNC directly and helping
 (5) the chairman.
 (6) Q: Did you ever seek to help the chairman do
 (7) something on behalf of some entity other than the RNC?
 (8) MR. WEINSTEIN: See, that's complicated there, Mr.
 (9) Robbins, because the chairman serves, let's say, as an
 (10) official of the International Democratic Union. The
 (11) Democratic Union, International Democratic Union is a group
 (12) of international political parties, and Mr. Reed might help
 (13) the chair--the chairman also appeared at a whole variety of
 (14) functions, the Davos Economic Summit, all of these things
 (15) which are not RNC functions but in his capacity as the
 (16) chairman, Mr. Barbour served as the honorary this or the
 (17) honorary that of a lot of things.
 (18) BY MR. ROBBINS:
 (19) Q: Who paid your salary?
 (20) A: The Republican National Committee.
 (21) Q: Did anybody other than the Republican National
 (22) Committee pay your salary?
 (23) A: No.
 (24) Q: Was it your understanding when you began working
 (25) there, Mr. Reed, that you were going to be paid by the

Page 13

[1] Republican National Committee in return for services that
[2] you were going to provide to the Republican National
[3] Committee?
[4] A: Yes.
[5] Q: And did that--is that what transpired?
[6] A: Yeah.
[7] Q: All right. Did you report to anybody other than
[8] the director--strike that--the chairman of the RNC?
[9] A: No.
[10] Q: And who reported to you?
[11] A: The entire staff of the Republican National
[12] Committee through the directors.
[13] Q: Would you outline for me, who is relatively
[14] ignorant of this, without exclusion of that limitation other
[15] things I'm ignorant of, what the structure of the RNC was?
[16] A: There is an office of the co-chairman.
[17] Q: Who was the co-chairman or who were the co-
[18] chairmen?
[19] A: Jeannie Austin was. Then there was a political
[20] director, there was a communications director.
[21] Q: Who was the political director?
[22] A: Robin Carl.
[23] Q: I'm sorry. Keep going.
[24] A: There was a communications director. There was--
[25] Q: I'm sorry. Who was that?

Page 14

[1] A: Chuck Greener. There was a general counsel or a
[2] legal counsel.
[3] Q: And who was that?
[4] A: Michael Hess.
[5] Q: There was a director of member relations, which
[6] was Larry Len Bertocchio.
[7] Q: Do you want to give a spelling for that, to the
[8] best of your ability?
[9] A: B-e-r-t-o-c-c-i-o. There was a finance director,
[10] who was Albert Mitchler. There was a director of
[11] administration, which was Jay Banning. I think that was--
[12] those are the major directors.
[13] Q: And all of those reported to you?
[14] A: Yes.
[15] Q: And then they, of course, had staffs that reported
[16] to them?
[17] A: Yes.
[18] Q: I wonder if you would be good enough to just
[19] briefly identify what the functions of these officers were.
[20] The co-chairman was Jeannie Austin.
[21] A: Was elected by the national committee.
[22] Q: And what were her responsibilities?
[23] A: She traveled the country and worked to promote
[24] Republican policies and ideas, did fund-raisers for
[25] candidates and parties, was not really involved in the day-

Page 15

[1] to-day operation of the committee.
[2] Q: Political director.
[3] A: Managed the field staff throughout the country and
[4] did the politics of winning elections.
[5] Q: Communications director.
[6] A: Managed the overall communications and the press
[7] operation for the national committee and coordinated it with
[8] state committees all over the country.
[9] Q: General counsel.
[10] A: Was our legal arms and eyes and ears on doing
[11] everything legally throughout the committee.
[12] Q: And he reported to you?
[13] A: Yes.
[14] Q: And did he have anybody who worked with him on
[15] staff?
[16] A: He had Allison. Tom Josefak.
[17] Q: Allison Fahrenkopf Brigati, who is here today.
[18] A: Had Tom Josefak, and there were a number of other
[19] lawyers. I don't remember all of them.
[20] Q: The last spelling?
[21] A: Josefak?
[22] Q: Yes.
[23] A: J-o-s-e-f-a-k.
[24] Q: And they were, all those three individuals--that
[25] individual, Mr. Hess, and Ms. Brigati--were full-time?

Page 16

[1] A: To my knowledge, they were full-time.
[2] Q: And did you work with them generally in ensuring
[3] that the activities of the RNC during the period that you
[4] worked as chief operating officer were in compliance with
[5] the Federal election laws?
[6] A: Yes.
[7] Q: And how, structurally, did you do that?
[8] A: Well, there were a number of different things.
[9] They were involved in all decisions that were made with
[10] funding going out to different candidates or state parties.
[11] They were part of the check-off process. They were also
[12] part of the--I know when we did direct mail it went through
[13] a check-off process, which counsel was part of signing off
[14] on. But basically they were part of any major decisions we
[15] were making on the direction we were taking the committee.
[16] Q: What role did they have in the National Policy
[17] Forum?
[18] A: They didn't have a direct role in the National
[19] Policy Forum, but as issues were coming forward, like when
[20] we were lending money to the National Policy Forum, they
[21] were on my side and part of making sure we were doing
[22] everything legally.
[23] Q: Well, when you say they were on your side, why
[24] don't you tell me everything you can remember doing with
[25] anybody on the Legal staff? I'll obviously address--I think

Page 17

[1] Mr. Weinstein is concerned. I don't want to hear at all
[2] about communications that you had with these individuals,
[3] but tell me what role they played--
[4] MR. WEINSTEIN: Are you talking about procedure,
[5] basically, Mr. Robbins?
[6] MR. ROBBINS: For the moment, yeah; starting from
[7] the very beginning.
[8] MR. WEINSTEIN: Very beginning of the first loan
[9] or very beginning of--I mean, I'm not sure beginning of
[10] what.
[11] MR. ROBBINS: Very beginning that the idea of the
[12] NPF arose.
[13] MR. WEINSTEIN: That assumes that Legal played a
[14] role in every step of the way.
[15] BY MR. ROBBINS:
[16] Q: What role--tell me what role they did. If they
[17] didn't play a role, don't make it up. Just tell me about
[18] the role--
[19] A: I'm not going to make anything up today, so you
[20] don't have to insult me.
[21] Q: No, I'm not insulting you. I'm just kind of
[22] pointing out that I wouldn't be asking you a question about
[23] something--
[24] MR. WEINSTEIN: But my question isn't--I'm asking
[25] you to clarify something, which is you have isolated at

Page 18

[1] least two different functions. Number one is the idea that
[2] created the NPF; there are the loans to the NPF; and there
[3] are various different aspects of this. And I'm not sure
[4] that Legal played a role in every one.
[5] MR. ROBBINS: Yes. And if it didn't, I'm simply
[6] asking you--
[7] THE WITNESS: The part I was talking about that
[8] Legal played a role in--
[9] MR. ROBBINS: I take your point.
[10] THE WITNESS: --was when we were executing loan
[11] documents, they would review them.
[12] MR. WEINSTEIN: If you want to ask him about other
[13] aspects, please do.
[14] MR. ROBBINS: You're absolutely right.
[15] BY MR. ROBBINS:
[16] Q: When was the first time that the Legal, the
[17] general counsel's office played any role at all, at all with
[18] respect to NPF?
[19] A: I can't remember.
[20] Q: What's the first role that you can remember them
[21] playing?
[22] A: The first role I can remember is when we made the
[23] first loan.
[24] Q: Tell me what you remember.
[25] A: I remember as the documents, before they came to

Page 19

(1) me, I had them go through our general counsel's office, like
 (2) we did-
 (3) Q: You sent them-
 (4) A: -on every contribution we made before it came for
 (5) my sign-off or the chairman's sign-off, they went through
 (6) Legal.
 (7) Q: With respect to-
 (8) A: Every contribution down to giving a state party
 (9) money.
 (10) Q: With respect to every contribution that the RNC
 (11) made to anybody, you had the general counsel's office sign
 (12) off on it?
 (13) A: That's correct.
 (14) Q: And with respect to every loan that was made to
 (15) the NPF, you had general counsel's office sign off on it?
 (16) A: Yes.
 (17) Q: And that occurred approximately how many times?
 (18) A: Well, I don't remember how many loans we made. I
 (19) don't remember. It was every time, I'm sure. I wouldn't
 (20) have signed off on something without the counsel having
 (21) looked at it.
 (22) Q: Each and every time a loan was made by the
 (23) Republican National Committee to the NPF, you signed off on
 (24) it or Haley Barbour did-
 (25) A: That's correct.

Page 20

(1) Q: And each and every time the RNC-
 (2) MR. WEINSTEIN: Are you saying that he signed off
 (3) or Haley Barbour signed off? Because I-
 (4) BY MR. ROBBINS:
 (5) Q: Either you signed off or Haley Barbour signed off
 (6) on it?
 (7) A: I signed off on it.
 (8) MR. WEINSTEIN: Okay. It may not be that Haley
 (9) signed off on it. I don't know.
 (10) MR. ROBBINS: Fair enough.
 (11) THE WITNESS: I think I signed the document.
 (12) BY MR. ROBBINS:
 (13) Q: Each and every time the Republican National
 (14) Committee loaned money to the NPF, you as the chief
 (15) operating officer of the Republican National Committee
 (16) personally signed off on it?
 (17) A: That's correct.
 (18) Q: And each and every time that occurred, you had the
 (19) general counsel of the Republican National Committee sign
 (20) off on it?
 (21) A: They reviewed it and signed off on it, that's
 (22) correct.
 (23) MR. WEINSTEIN: When we say sign off, there is a
 (24) sign-off sheet. I think they may not have signed the actual
 (25) loan document. I don't know. You may want to ask the

Page 21

(1) witness that, but that's not-
 (2) MR. ROBBINS: Fair enough.
 (3) BY MR. ROBBINS:
 (4) Q: You approved it each and every time it occurred?
 (5) A: Each and every time I approved it, yeah.
 (6) Q: Each and every time a loan was made by the RNC to
 (7) the NPF, it was approved by you?
 (8) A: That's correct.
 (9) Q: And each and every time a loan was made by the RNC
 (10) to the NPF, you transmitted it to the general counsel's
 (11) office within the Republican National Committee for its
 (12) approval?
 (13) A: Before it came to me, it went through the general
 (14) counsel's office.
 (15) Q: Okay. Why don't you actually-well, all right.
 (16) Were there meetings about the formation of the NPF within
 (17) RNC?
 (18) A: Yes.
 (19) Q: What's the first such meeting that you remember?
 (20) A: I don't really remember the first meeting because-
 (21) Q: My question actually is: What's the first meeting
 (22) that you do remember?
 (23) MR. WEINSTEIN: Let me see if I-I think there may
 (24) have been meetings prior to the RNC because this was part of
 (25) Chairman Barbour's plank that he ran on to become chairman

Page 22

(1) of the RNC. So if you're saying-
 (2) MR. ROBBINS: Fair enough.
 (3) MR. WEINSTEIN: -were there meetings, there may
 (4) have been meetings outside of the RNC prior.
 (5) MR. ROBBINS: Fair enough.
 (6) MR. WEINSTEIN: I don't know if he was involved.
 (7) MR. ROBBINS: You're absolutely right.
 (8) THE WITNESS: I wasn't involved.
 (9) MR. ROBBINS: Totally right.
 (10) BY MR. ROBBINS:
 (11) Q: What is your understanding of how the idea of the
 (12) NPF came about?
 (13) A: It was Haley's idea that the party needed to be in
 (14) the business of policy, and it was something he talked about
 (15) when he ran for chairman, part of his platform that he ran
 (16) on, and it was something after he got elected he wanted to
 (17) execute.
 (18) Q: So when Mr. Barbour was campaigning to become
 (19) chairman of the Republican National Committee, part of what
 (20) he told the Republican National Committee he wanted to do
 (21) was to create a policy arm?
 (22) A: Because he wanted to get the party back in the
 (23) business of talking about policy.
 (24) Q: And so-
 (25) A: There was a belief that we had drifted away from

Page 23

(1) that during the last couple years.
 (2) Q: And so part of what Chairman Barbour, then-
 (3) A: Candidate Barbour.
 (4) Q: -Candidate Barbour, told the Republican National
 (5) Committee was that he wanted the RNC to be in the business
 (6) of policy, and in that connection wanted to create an arm?
 (7) A: That's correct.
 (8) Q: And that arm was to be the National Policy Forum?
 (9) A: Was to be a body like the National Policy Forum.
 (10) I'm not sure he specifically named it.
 (11) Q: He articulated the idea of creating a policy arm
 (12) of the Republican National Committee.
 (13) A: I wouldn't quite call it a policy arm of the
 (14) Republican National Committee.
 (15) Q: Which-
 (16) A: He articulated the idea that the party needed to
 (17) get back in the business of talking about policy.
 (18) Q: And one of the planks, if you will, of his
 (19) campaign to become chairman of the Republican Party was
 (20) creating a policy-choose your phrase.
 (21) A: A think tank.
 (22) Q: A think tank connected to the party?
 (23) A: A think tank that believed in Republican policies
 (24) and ideas.
 (25) Q: And he told the RNC that one of the reasons that

Page 24

(1) he should be elected chairman of the party was to create
 (2) such a thing?
 (3) A: Because this is something I'm going to do.
 (4) Q: And he did.
 (5) A: He did.
 (6) Q: And what he created was the National Policy Forum;
 (7) correct?
 (8) A: Yes.
 (9) Q: Okay. And so from the moment that Mr. Barbour
 (10) became chairman of the Republican Party, as you understand
 (11) it, one of the things that he expressly stated that he
 (12) wanted to do was to create an entity like-which would
 (13) provide the functions of what ultimately became the National
 (14) Policy Forum?
 (15) A: That's correct.
 (16) Q: And what meetings or conversations, what work of
 (17) any kind had been done on creating that before you arrived
 (18) at the RNC-I think you said in February of 1993?
 (19) MR. WEINSTEIN: If you know. I mean-
 (20) THE WITNESS: I don't know.
 (21) BY MR. ROBBINS:
 (22) Q: Are you aware of any-
 (23) A: I'm not aware of anything besides that it was
 (24) discussed, because I heard it discussed during the campaign.
 (25) Q: In what fora did you hear it discussed?

Page 25

(1) A: Well, it was written in the plank that Haley put
(2) out why he was running, and I heard it discussed at the St.
(3) Louis meeting where the election was.
(4) Q: There was a written plank that Mr. Barbour
(5) circulated.
(6) A: It's called the Barbour Plan.
(7) Q: The Barbour Plan. And in the Barbour Plan, there
(8) is a description of creating a policy think tank?
(9) A: I believe so.
(10) Q: Of the party creating such a think tank; correct?
(11) MR. WEINSTEIN: Well, I think it's a little bit
(12) looser than that.
(13) MR. ROBBINS: Well, you know what? Here's the
(14) thing. You may have a different memory than him, but I've
(15) got to ask him the questions.
(16) MR. WEINSTEIN: I understand, but I think it's
(17) important to recognize, and obviously the witness knows,
(18) that there are some things that he can't speculate about or
(19) things that might get confusing in terms of segmenting in
(20) terms of time and documentation. But I don't want to
(21) interrupt you.
(22) MR. ROBBINS: No, no. It's not a matter of my
(23) sensibilities being offended. It's just simply a function
(24) of the need to get his testimony rather--
(25) MR. WEINSTEIN: Sure, because he's under oath.

Page 26

(1) MR. ROBBINS: --than yours. That's right. And
(2) the committee has these rules about witnesses testifying as
(3) opposed to lawyers.
(4) THE WITNESS: Okay. So what was your question?
(5) MR. WEINSTEIN: Ask your next question.
(6) MR. ROBBINS: Why don't you ask my previous
(7) question?
(8) [The reporter read back the requested portion of
(9) the record.]
(10) THE WITNESS: Yes.
(11) BY MR. ROBBINS:
(12) Q: Where did you first see a copy of that plan?
(13) A: St. Louis.
(14) Q: What were the circumstances?
(15) A: That's where the election was going to be held?
(16) Q: And it was circulated by Mr. Barbour?
(17) A: By his campaign team.
(18) Q: And did you ever see that again after St. Louis?
(19) A: Yes, I did.
(20) Q: Where?
(21) A: I referred to it throughout, periodically.
(22) Q: Throughout your tenure as chief operating officer
(23) of the RNC?
(24) A: I was executive director.
(25) Q: Executive director.

Page 27

(1) A: Of the Republican National Committee.
(2) Q: And under what circumstances would you refer to
(3) it?
(4) A: Periodically, I'd refer to it to make sure that I
(5) was executing everything we said we were going to execute
(6) when we ran.
(7) Q: And during the course of the two years that you
(8) served as executive director of the RNC, you made repeated
(9) efforts to confirm that you were doing with the National
(10) Policy Forum what Mr. Barbour had pledged to do in his
(11) plank?
(12) A: No. I reviewed the Barbour Plan periodically to
(13) see if we were doing the wide range of things we said we
(14) were going to do when we were running for chairman.
(15) Q: Did that include the NPF?
(16) A: Yes.
(17) Q: And where did you keep a copy of it?
(18) A: I don't remember. Probably in my office
(19) somewhere.
(20) Q: And when you left your office at the RNC to go to
(21) work for the Dole campaign, what happened to your files?
(22) A: I don't remember.
(23) Q: Did you take any with you?
(24) A: No.
(25) Q: Did you take any document with you from whatever

Page 28

(1) source that related to the NPF?
(2) A: I took no documents that related to the RNC or the
(3) NPF.
(4) Q: When was the last time that you saw any documents
(5) relating to the NPF?
(6) A: When we were preparing for the deposition today.
(7) Q: Okay. When was the time before that that you saw
(8) them?
(9) A: I don't remember. Years ago.
(10) Q: In the last six months, other than Mr. Weinstein
(11) or anybody with Foley & Lardner, has anybody sent you copies
(12) of any documents related to NPF?
(13) A: No.
(14) Q: Have you seen them anyplace?
(15) A: I've seen things in the paper. I don't know if
(16) they were actual documents or--I think I may remember seeing
(17) a photo of a document or something with NPF.
(18) Q: Other than your counsel, have you had any
(19) conversation with anybody about the NPF over the last six
(20) months?
(21) A: No.
(22) Q: There is not a single human being other than your
(23) counsel and your wife--
(24) A: I probably have talked to some of my business
(25) associates that I--why I am doing--going through the

Page 29

(1) deposition, that it regards NPF.
(2) Q: Who? Which individuals?
(3) A: Clients of mine. I don't need to--
(4) MR. WEINSTEIN: Why is that relevant, sir?
(5) MR. ROBBINS: Well, conversations that you had
(6) about NPF are obviously relevant.
(7) MR. WEINSTEIN: Well, but those conversations are
(8) clearly out of the time frame.
(9) MR. ROBBINS: I don't think so, but you can give
(10) any instruction that you--
(11) MR. WEINSTEIN: I think that with regard to any
(12) conversations he had with people in the scope of this last
(13) six months--
(14) MR. ROBBINS: About the NPF you think that's
(15) outside--that's going to be outside the scope of appropriate
(16) inquiry?
(17) MR. WEINSTEIN: But I'm not--depending on what the
(18) topic is, absolutely.
(19) MR. ROBBINS: NPF. I'm just asking about your
(20) NPF-related conversations.
(21) MR. WEINSTEIN: But, I mean, what about NPF?
(22) MR. ROBBINS: Anything about NPF.
(23) MR. WEINSTEIN: See, I don't think anything about
(24) NPF is covered.
(25) MR. ROBBINS: You're entitled to your opinion.

Page 30

(1) I'm going to ask the question and let's do it on the record.
(2) THE WITNESS: All right.
(3) BY MR. ROBBINS:
(4) Q: Have you had conversations with individuals other
(5) than your counsel and your wife about NPF over the last six
(6) months?
(7) MR. WEINSTEIN: I'm going to object to that
(8) question and direct the witness not to answer unless it's
(9) more specified in a way that brings it clearly within the
(10) committee's mandate.
(11) MR. ROBBINS: NPF is within the committee's
(12) mandate.
(13) MR. WEINSTEIN: Well, no, not necessarily, sir. I
(14) don't think every aspect of NPF is--
(15) MR. ROBBINS: I'm not going to argue with you, but
(16) you can have an instruction as many times as you'd like.
(17) BY MR. ROBBINS:
(18) Q: You indicated earlier there were individuals with
(19) whom you did speak about NPF; correct? Did you say that on
(20) the record before?
(21) A: Yes.
(22) MR. WEINSTEIN: You can answer that question.
(23) THE WITNESS: Yes.
(24) BY MR. ROBBINS:
(25) Q: How many such individuals were there?

Page 31

(1) MR. WEINSTEIN: I'm going to object to that as
(2) being outside the scope of the committee's mandate and
(3) direct the witness not to answer.
(4) BY MR. ROBBINS:
(5) Q: What did you say to them about the NPF?
(6) MR. WEINSTEIN: I'm going to direct the witness
(7) not to answer as that question is outside the scope of the
(8) committee's legal authority.
(9) BY MR. ROBBINS:
(10) Q: What did they say to you about the NPF?
(11) MR. WEINSTEIN: I'm going to direct the witness
(12) not to answer as that is, unless specified more clearly,
(13) outside of the committee's legal authority.
(14) BY MR. ROBBINS:
(15) Q: Did you talk to them about your role at the--with
(16) respect to NPF?
(17) MR. WEINSTEIN: Can I have a moment to confer with
(18) the witness?
(19) MR. ROBBINS: Absolutely.
(20) MR. WEINSTEIN: Because this may be helpful. Can
(21) we have a moment to step outside?
(22) MR. ROBBINS: Sure. Off the record.
(23) [Discussion off the record.
(24) MR. WEINSTEIN: Mr. Robbins, my main concern--I
(25) mean, I have some secondary concerns. I believe that your

Page 32

(1) questions are outside the legal scope of the mandate.
(2) However, I want to sort of differentiate two things. This
(3) witness under my direction is not going to name to you his
(4) individual clients or his current consulting practice, some
(5) of whom he may have talked to about these proceedings in
(6) sort of what's going on so they know why he's not there to
(7) answer their phone calls.
(8) If you want to ask him has he had any substantive
(9) conversations about the NPF and list a bunch of people or
(10) list groups of people, I think he can answer that question.
(11) MR. ROBBINS: Let me do it this--
(12) MR. WEINSTEIN: Because I understand sort of what
(13) you're getting at, and I think to some degree--I mean, I
(14) understand what you're getting at, but his main
(15) conversations--and I can say this to you in a proffer
(16) capacity--he has to keep his clients--
(17) MR. ROBBINS: Out of the newspapers.
(18) MR. WEINSTEIN: No. No, no, not that at all. He
(19) has to keep his clients, just like I have to keep my
(20) clients, informed as to why the heck I'm not in my office--
(21) MR. ROBBINS: I see, I see.
(22) MR. WEINSTEIN: --for days on end.
(23) THE WITNESS: Why I'm gone today.
(24) MR. PERRY: And it's not our business to be
(25) looking at his personal business matters.

Page 33

(1) MR. WEINSTEIN: But, for example, he may have a
(2) client that he has to make a phone call to today about an
(3) important matter, and the client says, Well, I'm going to
(4) call you in your office. He says, I'm not going to be in my
(5) office. Well, why aren't you going to be there? Well, I've
(6) got to do this, this, and this.
(7) MR. ROBBINS: Yeah.
(8) THE WITNESS: That was my point.
(9) MR. ROBBINS: And I want to be sensitive to that.
(10) On the other hand, I also want to make sure that I'm not
(11) excluded from getting communications which may be within the
(12) scope of--
(13) MR. WEINSTEIN: No, I understand.
(14) MR. ROBBINS: So let me see if I can--
(15) MR. WEINSTEIN: Please. Go ahead.
(16) BY MR. ROBBINS:
(17) Q: Have you had any conversations with anybody in the
(18) last six months about the role or purpose or function of the
(19) NPF?
(20) A: No.
(21) Q: Have you had any conversation with any former
(22) official or employee of the Republican Party about NPF?
(23) MR. WEINSTEIN: You mean aside with counsel?
(24) Because Ms. Brigati is an employee of the Republican Party.
(25) MR. ROBBINS: Well, I'll take it step by step, I

Page 34

(1) think.
(2) BY MR. ROBBINS:
(3) Q: For the moment, any conversation with anybody.
(4) A: Have I had any conversation?
(5) Q: Yes.
(6) A: With anybody from the Republican National
(7) Committee?
(8) Q: Yes.
(9) A: Yes.
(10) Q: Didn't I just ask you--
(11) A: I've had with Allison.
(12) Q: Okay. Apart from Allison.
(13) A: No.
(14) Q: Now, is Allison representing you today?
(15) A: No.
(16) Q: Has she ever represented you?
(17) MR. WEINSTEIN: Well, I think that--
(18) MR. ROBBINS: Can we have an answer from the
(19) witness?
(20) BY MR. ROBBINS:
(21) Q: Has she ever represented you?
(22) A: I don't believe so.
(23) Q: Okay. Has she represented you in the last six
(24) months?
(25) MR. WEINSTEIN: Let me see--

Page 35

(1) MR. ROBBINS: Actually, you know what? There's a
(2) question pending, so I'd like to have--
(3) MR. WEINSTEIN: But there's an attorney-client
(4) issue here that this witness--we are in a co-counsel
(5) relationship with lawyers inside the RNC, and we work in a
(6) co-counsel and joint defense relationship with lawyers,
(7) which make his communications with her privileged.
(8) MR. ROBBINS: I don't believe so.
(9) MR. PERRY: Well, you may disagree with that.
(10) MR. ROBBINS: Sure.
(11) MR. PERRY: He has the right to assert that now.
(12) MR. ROBBINS: Sure.
(13) MR. PERRY: We can bring that before the committee
(14) at some appropriate time. But it's not that you have the
(15) opportunity to run him over on this issue.
(16) MR. ROBBINS: I'm not going to run him over, but I
(17) do have the opportunity to ask a witness questions.
(18) MR. PERRY: Certainly.
(19) MR. ROBBINS: I think that's been the custom in
(20) these--
(21) MR. PERRY: Okay, but you were disagreeing--
(22) MR. ROBBINS: He's got counsel representing him,
(23) so I think that--
(24) MR. WEINSTEIN: Well, look, I mean, I don't want
(25) to make too much or too little about this. He said he's had

Page 36

(1) conversations with Allison. If you're getting into an issue
(2) about whether or not there exists some attorney-client--
(3) MR. ROBBINS: No, actually, under the
(4) circumstances, given the admissions that he's made on the
(5) record, on how many occasions--
(6) MR. WEINSTEIN: First of all--
(7) BY MR. ROBBINS:
(8) Q: On how many occasions--I'm not asking now about
(9) the communications. On how many occasions have you spoken
(10) with Allison about the NPF?
(11) A: Two.
(12) Q: When did they take place?
(13) A: Yesterday and probably about two weeks ago.
(14) Q: Okay.
(15) A: In preparation for today.
(16) Q: All right. Have you reviewed any documents
(17) provided to you by the RNC?
(18) MR. WEINSTEIN: Through me or directly through the
(19) RNC?
(20) MR. ROBBINS: Review of documents.
(21) BY MR. ROBBINS:
(22) Q: Did you review any documents?
(23) A: Yes.
(24) Q: Which documents did you review?
(25) MR. WEINSTEIN: First of all, I think that's

Page 37

Page 40

(1) covered by the attorney-client privilege.
(2) MR. ROBBINS: You make whatever instruction you
(3) like.
(4) MR. WEINSTEIN: I'm going to direct the witness
(5) not to answer as it's covered by the attorney-client
(6) privilege.
(7) BY MR. ROBBINS:
(8) Q: When did Mr. Weinstein commence representing you?
(9) A: I don't know, four or five weeks ago, six weeks
(10) ago. I don't know.
(11) Q: So that would be roughly--
(12) A: I'm sure I have a letter in my files.
(13) Q: And that letter would reflect the commencement of
(14) the representation? You have to say yes or no.
(15) A: Yes.
(16) Q: Okay. So that would be roughly June 1st?
(17) A: It may have been late May. I don't remember.
(18) Q: Okay. Did you ever have--did you have any
(19) conversation with any official or employee of the RNC prior
(20) to June--between January 1, 1997, and June 1, 1997, about
(21) NPF?
(22) MR. WEINSTEIN: I think he's already answered
(23) that.
(24) MR. ROBBINS: I'm going to ask the question.
(25) THE WITNESS: Yes.

Page 38

(1) BY MR. ROBBINS:
(2) Q: Okay. Who?
(3) A: Allison.
(4) Q: I think you said earlier--I may be wrong--that you
(5) had two conversations with Allison. One was yesterday, the
(6) other was two weeks ago. Was that your testimony?
(7) A: That's right. It was--
(8) Q: That would be--
(9) A: --whenever we started this process because Allison
(10) was at the first meeting, I believe.
(11) Q: And that would be, unless my math is wrong,
(12) subsequent to June 1, 1997. So my question to you is--
(13) A: No, it was after June 1st.
(14) Q: So my question to you is: Between January 1,
(15) 1997, and June 1, 1997, have you had any communication with
(16) any official or employee of the RNC about the National
(17) Policy Forum?
(18) MR. WEINSTEIN: I'm going to object as asked and
(19) answered.
(20) MR. ROBBINS: You may object. He may answer.
(21) THE WITNESS: I talked to Allison whenever we
(22) started doing this. If it was after June 1st, it was after
(23) June 1st, and the answer would be no.
(24) BY MR. ROBBINS:
(25) Q: Have you had any conversation with any former

Page 39

(1) employee or former official of the RNC?
(2) MR. WEINSTEIN: During what time period and about
(3) what?
(4) BY MR. ROBBINS:
(5) Q: Since January 1, 1997, about the NPF.
(6) A: Say your question again?
(7) Q: Have you had any conversation with any former
(8) official or employee of the RNC about the National Policy
(9) Forum?
(10) A: About the National Policy Forum specifically?
(11) Q: No, not specifically. Which in any way, sir,
(12) related to the National Policy Forum?
(13) A: Yes, I have.
(14) Q: Who?
(15) A: I had a conversation with Kirk Blalock, who now
(16) works for Philip Morris, that I was going to be coming and
(17) doing a deposition.
(18) Q: Who else?
(19) A: I don't remember anybody else. Kirk worked with
(20) me in the office.
(21) Q: I'm sorry?
(22) A: Kirk worked with me in the office.
(23) I don't remember anybody else.
(24) Q: What did he say to you, what did you say to him,
(25) about the NPF?

(1) A: I told him that I had counsel through Mr.
(2) Weinstein and that I was going to go give a volunteer
(3) deposition.
(4) Q: Did you talk about what the subject matter of the
(5) deposition was?
(6) A: No.
(7) Q: I am asking you, is there any other former
(8) official or former employee of the Republican National
(9) Committee that you have spoken to about the RNC between
(10) January 1, 1997 and--
(11) MR. WEINSTEIN: Mr. Robbins, that he has spoken to
(12) about the RNC?
(13) THE WITNESS: Spoken to about the RNC?
(14) MR. ROBBINS: Fair enough.
(15) BY MR. ROBBINS:
(16) Q: Is there any former official or former employee
(17) with the RNC with whom you have spoken about the NPF between
(18) January 1, 1997 and June 1, 1997 other than this individual?
(19) MR. WEINSTEIN: Other than Mr. Blalock?
(20) MR. ROBBINS: Yes.
(21) THE WITNESS: No.
(22) BY MR. ROBBINS:
(23) Q: Have you spoken to any official or former official
(24) of the NPF since January 1, 1997?
(25) A: About the NPF or just in general?

Page 41

(1) Q: In general.
(2) A: Yes, I have.
(3) Q: Who?
(4) A: Don Nickles, Senator Nickles. I ran into him on
(5) an airplane.
(6) Q: Who else?
(7) A: That's it. I ran into Brock once on an airplane,
(8) too, Bill Brock, and neither time did we discuss the NPF.
(9) Q: What was former Senator Brock's role at the NPF?
(10) A: I believe he was on the board.
(11) Q: What was Senator Nickles' role in the NPF?
(12) A: I believe he was on the board.
(13) Q: Did you work with him when you were executive
(14) director of the RNC on NPF matters?
(15) A: With who?
(16) Q: Senator Nickles.
(17) A: No.
(18) Q: You had no contact with him with respect to NPF
(19) work?
(20) A: Zero.
(21) Q: Have you spoken to Jay Banning since January 1,
(22) 1997?
(23) A: I may have. I know my office called Jay the other
(24) day, and I didn't talk to Jay. My office did, to confirm
(25) the day. I wanted to know what day I had left the national

Page 42

(1) committee, and she told me, out of my personnel records.
(2) MR. WEINSTEIN: Do you want to ask who Mr. Banning
(3) is, so that will give you--
(4) MR. ROBBINS: Director of Administration.
(5) THE WITNESS: Yes, at the RNC.
(6) I don't think I talked to Jay. I think I talked
(7) to his assistant.
(8) BY MR. ROBBINS:
(9) Q: Have you spoken to Haley Barbour since January 1,
(10) 1997?
(11) A: I think I ran into Haley at a reception one night,
(12) casually. I said hello. That was it.
(13) Q: No conversation about the NPF?
(14) A: No.
(15) Q: Have you spoken to Henry Barbour since January 1,
(16) 1997?
(17) A: No.
(18) Q: Have you spoken to Michael Baroody since January
(19) 1, 1997?
(20) A: No.
(21) Q: Have you spoken to Benton Becker since January 1,
(22) 1997?
(23) A: I don't know who Benton Becker is.
(24) Q: Have you spoken to--you mentioned Kirk
(25) Blalock--John Bolton since January 1, 1997?

Page 43

[1] A: No.
[2] Q: Have you spoken to Mark Braden?
[3] A: No.
[4] Q: Have you spoken to Lee Brown?
[5] A: I don't believe I know who Lee Brown is.
[6] Q: Have you spoken to Mary Mead Crawford?
[7] A: I may have once earlier in the year, not about the
[8] NPF, about a press issue because she was at the national
[9] committee as the press person, but I don't remember what it
[10] was. I just think I talked to her once.
[11] Q: She is spokeswoman for the RNC?
[12] A: Yes, she was. I don't know if she still is.
[13] Q: She was also spokeswoman for the NPF?
[14] A: I didn't know that.
[15] Q: Okay. Was there a spokesperson for the NPF that
[16] you knew of when you were at the RNC?
[17] A: I don't remember. I don't think so.
[18] Q: Have you spoken to Matt Crowe since January 1,
[19] 1997?
[20] A: I don't know who Matt Crowe is.
[21] Q: Have you spoken to Dan Denning?
[22] A: No.
[23] Q: Have you spoken to Don Fierce?
[24] A: Yes.
[25] Q: Who is Don Fierce?

Page 44

[1] A: Don Fierce is a friend of mine.
[2] Q: Have you had any conversation with him which in
[3] any way touched on or related to the NPF?
[4] A: No.
[5] Q: How about Ed Gillespie?
[6] A: I ran into him on the street a couple of months
[7] ago.
[8] Q: Have you spoken to him in any respect about the
[9] NPF?
[10] A: No.
[11] Q: How about Lanny Griffith?
[12] A: I haven't spoken to him this year.
[13] Q: How about Kelly Geisner?
[14] MR. WEINSTEIN: Geisner.
[15] THE WITNESS: I spoke to her probably three or
[16] four months ago. I had a potential piece of business for
[17] her.
[18] BY MR. ROBBINS:
[19] Q: And who is she?
[20] A: She's a friend. She's a fund-raiser.
[21] Q: She had done fund-raising for the National Policy
[22] Forum?
[23] A: Uh-huh.
[24] Q: You have to say yes or no, please.
[25] A: Yes.

Page 45

[1] Q: When did she start doing fund-raising for the
[2] National Policy Forum?
[3] A: I don't remember. I imagine sometime in 1993.
[4] Q: While you were executive director?
[5] A: That's correct.
[6] Q: Did you work with her in that regard?
[7] A: As she was doing fund-raising for the NPF?
[8] Q: Yes.
[9] A: No.
[10] Q: How did you know she was doing fund-raising for
[11] the NPF?
[12] A: Because I believe she had been employed by the RNC
[13] and left to go work for the NPF. So I knew where she was
[14] going.
[15] Q: She went right from the RNC to the NPF?
[16] A: I believe. I'm not sure if she came in, right to
[17] the NPF but I thought she worked for us for a while.
[18] Q: Was there anybody on the payroll of the RNC who
[19] did any fund-raising work for the National Policy Forum?
[20] A: Yeah, Haley.
[21] Q: Anybody else?
[22] A: Not that I'm aware of.
[23] Q: Was Haley Barbour at the time that he was doing
[24] the fund-raising work for the National Policy Forum paid, to
[25] your knowledge, by the National Policy Forum?

Page 46

[1] A: To my knowledge, he was never paid by the National
[2] Policy Forum.
[3] Q: So he was doing--
[4] A: But I wouldn't have knowledge of that.
[5] Q: To your knowledge?
[6] A: To my knowledge, he wasn't, but I--
[7] Q: To your knowledge, he was fund-raising for the
[8] National Policy Forum while being paid by the Republican
[9] National Committee?
[10] A: To my knowledge, he was the chairman of the
[11] national committee.
[12] Q: That, I knew.
[13] A: He was paid by the national committee. He did a
[14] lot of travel. He did a lot of fund-raising for
[15] organizations and for State parties and for candidates.
[16] Q: And one of the organizations for which he did
[17] fund-raising was the National Policy Forum?
[18] A: That's correct, as his role as chairman.
[19] Q: As his role of chairman of the National Policy
[20] Forum?
[21] A: That is correct.
[22] Q: Did he do it in his capacity as chairman of the
[23] Republican National Committee?
[24] A: I think it's difficult to differentiate when he
[25] was wearing his RNC chairman hat and his NPF hat.

Page 47

[1] Q: Why is that difficult to differentiate for you?
[2] A: Because I didn't manage his day, down to what he
[3] was doing.
[4] Q: To your knowledge, did he in any way segregate his
[5] files for NPF for his work on behalf of NPF in the work that
[6] he was doing generally as chairman of the Republican
[7] National Committee?
[8] A: Did he segregate his files? I don't know. I
[9] didn't keep his files.
[10] Q: Who were his assistants when you were executive
[11] director of the RNC?
[12] MR. WEINSTEIN: Do you mean who was in the
[13] chairman's office?
[14] MR. ROBBINS: Yes.
[15] THE WITNESS: Sanford McAllister was his executive
[16] assistant. Kirk Bialock was his personal traveling aide,
[17] and a woman named Pam was his scheduler for the first part.
[18] Suzanne Scruggs became the scheduler for the second year,
[19] and then Barbara was involved. I don't remember Barbara's
[20] last name. She was his typist, and Molly answered the
[21] telephone.
[22] BY MR. ROBBINS:
[23] Q: Have you had any conversation with Scott Gunn
[24] since January 1, 1997?
[25] A: Scott Gunn?

Page 48

[1] Q: Yes.
[2] A: Yes.
[3] Q: Did it touch in any respect on NPF?
[4] A: No.
[5] Q: How about William Harris?
[6] A: No conversation since this year.
[7] Q: Barbara Harrison?
[8] A: The new co-chairman, Barbara Harrison?
[9] Q: Did Barbara Harrison raise money for the NPF? Was
[10] there a fund-raiser for the NPF named Barbara Harrison?
[11] A: I don't know.
[12] THE WITNESS: What is the co-chairman's name now?
[13] MS. BRIGATI: Beth.
[14] THE WITNESS: I don't know. Wrong person.
[15] BY MR. ROBBINS:
[16] Q: Chris Hennick?
[17] A: I ran into Hennick about three weeks ago at a
[18] social event.
[19] Q: Any reference at all to the NPF?
[20] A: No, none.
[21] Q: Ken Hill?
[22] A: No contact.
[23] Q: Mark Himmelstein?
[24] A: No contact.
[25] Q: Kip Howlett?

Page 49

[1] A: I think I saw him at a reception earlier in the
[2] year.
[3] Q: Who was Kip Howlett?
[4] A: Kip is a lobbyist here in town. He works for the
[5] Chemical Manufacturers.
[6] Q: He had a role at NPF?
[7] A: He had a role at NPF at some period. I don't
[8] remember exactly when. That's how I knew him.
[9] Q: I had begun asking you about the first meeting
[10] that you could remember that related in any way to the
[11] National Policy Forum, and you said that you couldn't
[12] remember the first meeting. You felt there had been some
[13] stuff that happened before you got to the RNC.
[14] A: Right, to the RNC.
[15] Q: What work did you do that related to the NPF while
[16] you were on the payroll of the Republican National
[17] Committee?
[18] A: I didn't do any work directly for the NPF. I
[19] worked for the chairman, and I would advise the chairman at
[20] different times on what was going on at the NPF, from my
[21] observation, because we were lending them money, start-up
[22] money to get the organization going.
[23] Q: Did you have conversations with Mr. Barbour on a
[24] regular basis about the NPF?
[25] MR. WEINSTEIN: What time period, Counsel?

Page 50

[1] BY MR. ROBBINS:
[2] Q: While you were at the Republican National
[3] Committee.
[4] A: I don't know how-
[5] MR. WEINSTEIN: Two-year time period?
[6] MR. ROBBINS: Yes.
[7] THE WITNESS: I don't know how you would define a
[8] regular basis. I had numerous conversations with him
[9] throughout the day on a number of issues. I don't remember
[10] how many times NPF was discussed or not discussed.
[11] BY MR. ROBBINS:
[12] Q: Well, would you talk to him every time the NPF
[13] spoke to someone at the RNC about infusion of money?
[14] A: He would know every time there was going to be a
[15] loan that was made to the NPF, yes, because before I did it,
[16] I talked with him about it.
[17] Q: So, before you approved infusion of money into the
[18] NPF, you would speak to him?
[19] A: If I could find him. There may have been one or
[20] two instances where I did it without his knowledge because
[21] he was incommunicado, but I would always tell him before
[22] what I was going to do with lending money, as I did with all
[23] commitments financially.
[24] Q: Sure. And as a general matter, I take it you will
[25] agree, that each and every time-as a general matter-the

Page 51

[1] NPF came to the RNC for money, you would speak to Haley
[2] Barbour about it?
[3] A: Yes.
[4] Q: How would you find out that the NPF wanted money?
[5] A: Gees, I don't-either somebody would call me or I
[6] think it ultimately got to the point where somebody would
[7] call Jay Banning, who was our administrative director, as I
[8] explained earlier, and he would come across and tell me.
[9] Q: Who were the somebodies who would call you?
[10] A: Well, it would be somebody in the leadership over
[11] there. It may have been Baroody. It may have been Denning.
[12] I don't remember, but it would have been one of the people
[13] that were in the leadership.
[14] Q: They would send you a memo, come over and talk to
[15] you, call you up? How did that work?
[16] A: As I remember, we developed some type of loan
[17] documents that were fairly standard that we would use every
[18] time we would give them a loan.
[19] Q: At whose instructions were those documents
[20] prepared?
[21] A: I don't remember. I mean, it was somebody. You
[22] know, it was either the counsel's or the chairman's or mine.
[23] Somebody said we had to have some documents.
[24] Q: Let me ask you this. When you arrived at the RNC,
[25] were these standard loan documents to process the flow of

Page 52

[1] money already in existence?
[2] A: I don't believe so. This was something we did.
[3] Q: So, when you say something we did, something
[4] either done at your direction or somebody who worked for
[5] you, there were loan documents which were created to process
[6] the regular flow of money?
[7] A: Correct.
[8] Q: Where were those documents kept?
[9] MR. WEINSTEIN: You mean aside from on a computer?
[10] MR. ROBBINS: Actually, by where, I mean just
[11] where.
[12] MR. WEINSTEIN: After they were executed?
[13] MR. ROBBINS: I guess that was one of those words
[14] that sort of speaks for itself. I am looking sort of for a
[15] location kind of a thing.
[16] THE WITNESS: Probably with Mr. Banning in
[17] Administration, but possibly a copy for counsel. I'm not
[18] sure. They weren't in my office.
[19] BY MR. ROBBINS:
[20] Q: So let me see if I understand this. There would
[21] be some contact that went from the NPF to the RNC requesting
[22] money, correct?
[23] A: Correct.
[24] Q: And somebody, either Denning or Baroody, probably
[25] would speak to you about it?

Page 53

[1] A: Usually.
[2] Q: Would they tell you why they needed the money?
[3] A: At times, usually.
[4] Q: Was that your custom and practice to at least try
[5] to ascertain-
[6] A: I would usually ask why.
[7] Q: Ascertain the purposes for which they needed the
[8] money?
[9] A: Uh-huh.
[10] Q: You have to say yes or no, please.
[11] A: Yes. It was usually for payroll.
[12] Q: They would explain to you that as the chief
[13] executive officer, the executive director of the RNC, why
[14] they needed money, whether it was to meet payroll or to meet
[15] other certain specific expenses?
[16] A: Usually, they would. That's correct.
[17] Q: Based on the NPF telling you why they needed money
[18] and for what purposes, you would make a determination as to
[19] whether or not the RNC would go ahead and-
[20] A: Make that loan, correct.
[21] Q: -make that additional loan.
[22] Was there ever any time when the National Policy
[23] Forum asked the RNC for more money when you declined?
[24] A: I don't remember. I believe there were a couple
[25] of times they asked for money and we didn't give them the

Page 54

[1] full amount, but I don't specifically remember when or why.
[2] There must have been a reason.
[3] Q: Can you think of any occasion when they asked for
[4] money when you didn't give them the amount that they wanted?
[5] A: No, but I believe it happened once or twice. I
[6] don't believe we gave them 100 percent of what they asked
[7] every time.
[8] Q: Now, Mr. Weinstein raises inadvertently a good
[9] point, which is are any of these forms, to you knowledge-
[10] MR. ROBBINS: Well, let me ask you. Are any of
[11] these forms on the computers at the RNC now?
[12] MR. WEINSTEIN: I don't know, but I can find out
[13] for you.
[14] MR. ROBBINS: Yes. I assume that that would be
[15] within the scope of the document requests that have been
[16] made.
[17] MR. WEINSTEIN: Document requests or request by
[18] this Committee? We received your subpoena from this
[19] Committee, and I am not sure-I'm thinking of three
[20] different things at the same time. What I really need to do
[21] is find out from you if those documents were in existence on
[22] the computer, and I will find out.
[23] MR. ROBBINS: Okay, because it should go without
[24] saying that any computer-generated information, computer
[25] information of any kind related to the NPF would be within

Page 55

(1) the ambit of the documents that we would seek
(2) MR. WEINSTEIN: That is your opinion. I mean, I
(3) certainly recognize that your view is that any documentation
(4) pertaining to the NPF is within the legal scope of the
(5) Committee's mandate.
(6) MR. ROBBINS: And that that would include-by
(7) information, that includes anything which is on a computer.
(8) MR. WEINSTEIN: I mean, we are in agreement-
(9) MR. ROBBINS: Okay.
(10) MR. WEINSTEIN: -that if it is within the scope
(11) of the Committee.
(12) MR. ROBBINS: Yes, sure.
(13) MR. WEINSTEIN: The fact that it is on a computer
(14) is certainly no bar to its production.
(15) MR. ROBBINS: Right.
(16) MR. WEINSTEIN: We are totally in agreement-
(17) MR. ROBBINS: Okay.
(18) MR. WEINSTEIN: -on that.
(19) Where we either have no knowledge or disagree is I
(20) am not sure what was on the computer, although I can
(21) certainly find out.
(22) MR. ROBBINS: Yes. If it is within the scope,
(23) that even if it is a stone tablet, we would like it.
(24) MR. WEINSTEIN: Even if there are boxes kept in a
(25) storage area in the men's room that are inadvertently

Page 56

(1) discovered by a lawyer at 2:00 a.m. when he is in the middle
(2) of a document search, they are within the scope of your
(3) review, and that that has, in fact, been done.
(4) Where we don't agree is whether or not they are
(5) within the legal right of the Committee, simply because they
(6) mention NPF, and that is maybe where we have a legal
(7) disagreement, but certainly the fact that something is on
(8) e-mail or on computer does not take it-does not make it
(9) different than if it is a piece of paper in somebody's
(10) files.
(11) MR. ROBBINS: Well, let me ask you this. Are
(12) there documents which mention NPF in any way at all which
(13) are being withheld at present?
(14) MR. WEINSTEIN: Being withheld?
(15) MR. ROBBINS: Yes.
(16) MR. WEINSTEIN: I wouldn't say they are being
(17) withheld. I would say that there are documents which
(18) mention NPF which are not viewed by the RNC to be within the
(19) mandate of the Committee's legal authority.
(20) MR. ROBBINS: Well-
(21) MR. WEINSTEIN: "Withheld" is a different word.
(22) Our view is-
(23) MR. ROBBINS: I don't want-
(24) MR. WEINSTEIN: -more appropriate that you don't
(25) have the legal authority to even get them.

Page 57

(1) MR. ROBBINS: Well, this is useful. Have you
(2) conducted a search to determine whether or not there are
(3) computer records that relate to-
(4) MR. WEINSTEIN: But I'm not supposed to be
(5) answering the questions.
(6) MR. ROBBINS: Yes, I know.
(7) MR. PERRY: This is not really part of the
(8) deposition.
(9) MR. WEINSTEIN: We can go off the record.
(10) MR. ROBBINS: No, no, no. I want to leave it on
(11) the record.
(12) MR. WEINSTEIN: Well, wait a minute. We'll talk
(13) about this afterwards.
(14) MR. ROBBINS: For the moment, I'm asking because I
(15) understand that-
(16) MR. WEINSTEIN: Yes.
(17) MR. ROBBINS: -there's been representation that
(18) the compliance with the outstanding document request is
(19) complete. Has there been a search of computer records to
(20) determine whether or not there are any documents within the
(21) scope of the request?
(22) MR. WEINSTEIN: Yes.
(23) MR. ROBBINS: Okay. And have you identified any
(24) such-
(25) MR. WEINSTEIN: Allison is looking at me. I am

Page 58

(1) comfortable in all of the statements that I made, but there
(2) is a legal issue that you and I disagree on, and we can take
(3) that up after the deposition. I mean, that's sort of where
(4) we are going to leave it.
(5) MR. SHAW: This is Mr. Reed's deposition.
(6) MR. ROBBINS: Oh, I understand, but I am sure that
(7) you are as interested in getting these documents as I am.
(8) MR. SHAW: Of course.
(9) MR. WEINSTEIN: Sir, I'm done commenting on this
(10) issue. I think we've given you a full and complete analysis
(11) of what I have said to you, everything I intend to say on
(12) this issue.
(13) MR. ROBBINS: Okay.
(14) BY MR. ROBBINS:
(15) Q: Let me ask you this, Mr. Reed. Let me go back
(16) over the process by which the NPF would make these requests.
(17) You would receive typically a phone call from Mr. Denning or
(18) Mr. Baroody?
(19) A: I believe so, yes.
(20) Q: And they would explain verbally to you that they
(21) wanted more money?
(22) A: Yes.
(23) Q: What would you then do, typically?
(24) A: I would then discuss it with the chairman and
(25) notify Mr. Banning to develop a new set of documents to go

Page 59

(1) to NPF to be signed, so that a check could follow.
(2) Q: Did you require, typically, any kind of written
(3) description of why-
(4) A: No.
(5) Q: -the money was needed?
(6) A: Not that I remember, no.
(7) Q: At any time, did you, that you can remember,
(8) require the NPF to set forth in written form why they needed
(9) money?
(10) A: Not that I remember, no.
(11) Q: Did you-
(12) A: I was managing the committee at the time.
(13) Q: I understand. Did you ever do that?
(14) A: Did I ever do what?
(15) Q: Did you ever ask the NPF to provide any written
(16) description what they were doing and the purposes for which
(17) they needed money?
(18) A: I don't remember I did, no. I don't believe I
(19) did.
(20) Q: Do you have any knowledge that anybody else at the
(21) RNC did?
(22) A: Not that I'm aware of.
(23) Q: To your knowledge, did the NPF ever set forth in
(24) writing in connection with these requests for money the
(25) purposes for which it needed the money?

Page 60

(1) A: I do not remember.
(2) Q: You have no recollection of it at the moment?
(3) A: I have no recollection. That's right.
(4) Q: At any time, did the RNC request of the National
(5) Policy Forum a description of what it was doing?
(6) A: I don't believe so.
(7) Q: At any time, did the Republican National Committee
(8) deem it necessary to get any kind of written description of
(9) the purposes to which the National Policy Forum was putting
(10) the money?
(11) A: I don't remember having anything in writing on
(12) that, no.
(13) Q: Now, did you have a file on National Policy Forum?
(14) A: I don't believe so, no.
(15) Q: Did you ever receive any written communication
(16) that you can remember from the National Policy Forum?
(17) A: I would occasionally see things that were on their
(18) way to the chairman that would be copied to me, either
(19) inadvertently or advertently.
(20) Q: Of what nature?
(21) A: For his sign-off. Things like an agenda for a
(22) meeting, some of the written material early on, but I did
(23) not have a file and I did not-was not regularly in the loop
(24) on it.
(25) Q: At any time, did you ask anybody at the National

Page 61

(1) Policy Forum to provide an accounting of what they were
(2) doing with all the money that was being provided by the RNC
(3) to the National Policy Forum?
(4) A: I don't remember if I asked for a specific
(5) accounting. I do remember I had a rough understanding of
(6) what the payroll was burning, which was most of the money
(7) that was being spent, but I don't remember if I asked for a
(8) specific-I don't remember.
(9) Q: Well, for the record, you had a rough
(10) understanding of-
(11) A: What the payroll was for.
(12) Q: -what the payroll was for, but did you ever
(13) ask-did the RNC as creditor ever ask the National Policy
(14) Forum as debtor for a specific description of what it was
(15) doing with all of the money that was being provided to it?
(16) A: I don't remember that, no.
(17) Q: Did you ever ask the National Policy Forum for a
(18) specific written request for money?
(19) A: Repeat the question? Did I ever?
(20) Q: Did you ever ask the National Policy Forum for a
(21) written request for-
(22) A: I may have.
(23) Q: -the additional money?
(24) A: I may have earlier in the process as we were
(25) developing a process on how we were going to operate with

Page 62

(1) the loans. I don't remember.
(2) Q: Do you have any recollection ever having done so?
(3) A: I don't remember.
(4) Q: Did you ever see, that you can remember, any
(5) written request that the National Policy Forum was obliged
(6) to send over to the RNC for cash?
(7) A: I do not remember.
(8) Q: So the National Policy Forum's request for money
(9) and your approval of it prior to its being sent for
(10) processing would all occur without any paper; is that fair
(11) to say?
(12) A: That's fair to say, but you missed a step there
(13) because I would talk to the chairman about it before it went
(14) to processing.
(15) Q: Okay. So-
(16) A: An important step.
(17) Q: Fair enough. The National Policy Forum would
(18) contact you verbally and say it wanted more money, right?
(19) A: Uh-huh.
(20) Q: You have to say yes or no.
(21) A: Needed more money. That is correct.
(22) Q: Needed more money.
(23) You would talk to the chairman?
(24) A: That is correct.
(25) Q: And you would approve it?

Page 63

(1) A: That is correct.
(2) Q: All of those steps happening without any
(3) documentation at all?
(4) A: To the best of my recollection.
(5) Q: What I have said is correct?
(6) A: Correct.
(7) Q: As we sit here, you have no recollection of
(8) anybody at the RNC ever requiring anything in writing from
(9) the National Policy Forum before you and the chairman
(10) approve an infusion of more money?
(11) A: There may have been a time where the loan
(12) documents got to Mr. Banning before somebody got to me, but
(13) that's the only instance I can think of.
(14) Q: Apart from what may or may not have occurred, you
(15) have no recollection of any time when the National Policy
(16) Forum was required to provide anything in writing to you or
(17) Mr. Barbour before you approved the infusion of more money?
(18) A: That's correct. I have no recollection.
(19) Q: That's correct, you have no recollection of any
(20) such written documentation-
(21) A: Documents.
(22) Q: -being required?
(23) A: That's correct.
(24) Q: By documentation, I mean any kind of description
(25) at all of what the money was going to go for, right?

Page 64

(1) A: That's correct.
(2) Q: Now, you would then communicate-I take it, the
(3) process was that after you consulted with Mr. Barbour or you
(4) just did it on your own if you couldn't reach Mr. Barbour,
(5) you would then give directions to the General Counsel's
(6) Office to prepare the loan documentation?
(7) A: No. I'd give directions to Mr. Banning's office.
(8) Q: Excuse me. You'd give direction-
(9) A: To prepare the loan documents.
(10) Q: And would you do that in writing or-
(11) A: No. I'd just call him and say do it.
(12) Q: Would you tell him what the money was going to be
(13) used for?
(14) A: No.
(15) Q: Would you necessarily know what the money was
(16) going to be used for?
(17) A: I would have a rough idea that most of the money
(18) was being used for payroll.
(19) Q: Apart from that rough idea, did you have any
(20) specific knowledge of what was going on?
(21) A: No.
(22) Q: But you knew that the National Policy Forum was
(23) something to which the chairman was committed, correct?
(24) A: Correct.
(25) Q: And that if a determination had been made, that it

Page 65

(1) was desirable for the RNC to provide money to the National
(2) Policy Forum, correct?
(3) A: "Desirable" may not be the right word. It wasn't
(4) very desirable.
(5) Q: Was it undesirable?
(6) A: It was necessary to get the National Policy Forum
(7) up and running. We supplied the seed money.
(8) Q: Fine. So there was a determination made by you
(9) and the chairman or the chairman that it was necessary for
(10) the RNC to provide this money to the National Policy Forum?
(11) A: That is correct.
(12) Q: Necessary for the RNC or necessary for the
(13) National Policy Forum?
(14) A: Necessary for the National Policy Forum.
(15) Q: Obviously, the RNC wasn't under any legal
(16) obligation to provide the money?
(17) A: We were under no legal obligation.
(18) Q: So, I take it, we can agree that the RNC, through
(19) its chairman and through you, determined that there was some
(20) purpose that aided the RNC in providing the money to the
(21) National Policy Forum?
(22) A: It was a purpose that aided one of the chairman's
(23) goals which was to start a think tank to promote Republican
(24) ideas.
(25) Q: As set forth in his campaign to be chairman of the

Page 66

(1) Republican National Committee, right?
(2) A: Correct.
(3) Q: And you understood that you were serving him in
(4) that capacity, correct?
(5) A: Correct.
(6) Q: Now, Mr. Banning-what is your understanding of
(7) what Mr. Banning does?
(8) A: He's the director of Administration.
(9) Q: I'm sorry. What was your understanding he then
(10) does when you call him and say do it?
(11) A: He would work with his accounting team, whoever
(12) that was, to prepare the documents.
(13) Q: What documents? When you speak about documents,
(14) what documents?
(15) A: The loan documents between the national committee
(16) and NPF.
(17) Q: Consisting of what?
(18) A: Consisting of whatever legal relationship on the
(19) specific loan had been set up, that they would be liable to
(20) the RNC for the money. He would prepare the documents.
(21) They would probably go through counsel, then to me to be
(22) executed, and by the time they were done there, he would
(23) have a check-out or a wire transfer at the NPF.
(24) Q: Would you tell him in your conversation with him
(25) how much the loan was to be?

Page 67

(1) A: Of course.
(2) Q: Did you keep copies of those documents in your
(3) office?
(4) A: I don't remember.
(5) Q: Where were they kept, to your knowledge?
(6) A: Either in Mr. Banning's office or if counsel kept
(7) a copy. They weren't in my office, to my knowledge.
(8) Q: You're kind of nodding over to Mr. Weinstein when
(9) you say that, but do you mean, in fact, the general-the
(10) inside counsel, in-house counsel of the Republican National
(11) Committee?
(12) A: I wasn't nodding to Mr. Weinstein.
(13) Q: I'm sorry. I'm sorry. I didn't mean to suggest
(14) there was anything wrong. I thought that you were-
(15) A: No. I was thinking where in the building. It was
(16) over there and it was over there.
(17) Q: All right. Now, did you ever attend meetings with
(18) Mr. Baroody?
(19) A: Yes.
(20) Q: Did Mr. Baroody have a position at the RNC during
(21) this period?
(22) MR. WEINSTEIN: What period, sir?
(23) BY MR. ROBBINS:
(24) Q: The period that you were at the RNC.
(25) A: No.

Page 68

(1) Q: So, when you were meeting with him, you were
(2) meeting with him in his capacity as an official of the
(3) National Policy Forum?
(4) A: That is correct.
(5) Q: Each time that you would meet with him during that
(6) period, you were meeting with him in his capacity as
(7) official of the National Policy Forum?
(8) A: That's correct.
(9) Q: Did you have meetings with Mr. Banning?
(10) A: Yes.
(11) Q: I'm sorry. With Mr. Denning? Excuse me.
(12) A: Yes.
(13) Q: And each time you met with him, it was in his
(14) capacity as official of the National Policy Forum?
(15) A: That's correct.
(16) Q: Did you meet with other officials of the National
(17) Policy Forum during this two-year period?
(18) A: There was a young lady that worked for Mr.
(19) Baroody. I don't remember her name. She would occasionally
(20) be in meetings. Kip Howlett would be, occasionally.
(21) Q: Who is Kip Howlett?
(22) A: He worked up at the-he was one of the names you
(23) read off to me earlier. He worked up at the Forum. I don't
(24) believe there were other people I dealt with at the NPF.
(25) Q: Did you have meetings with these individuals about

Page 69

(1) raising money for the National Policy Forum?
(2) A: Not that I remember. We had meetings usually in
(3) the chairman's office where I-
(4) Q: The chairman of the?
(5) A: National committee, where I would attend
(6) sometimes. I don't think I was at every meeting.
(7) Q: So the meetings with the-your meetings with the
(8) officials of the National Policy Forum were held in the
(9) office of the chairman of the Republican party?
(10) A: The meetings that I was involved in, yes.
(11) Q: Were there minutes kept?
(12) A: Not that I'm aware of.
(13) Q: Were there agendas that you ever saw?
(14) A: There were agendas, yes.
(15) Q: Was that typically the case?
(16) A: I don't know.
(17) Q: But you remember seeing agendas?
(18) A: I remember seeing agendas. Sometimes I would set
(19) the agenda.
(20) Q: I'm talking about written agendas.
(21) A: Uh-huh. [Nodding head up and down.]
(22) Q: You have to answer yes or no.
(23) A: Yes.
(24) Q: You would prepare them?
(25) A: I would prepare for the chairman ideas that I

Page 70

(1) thought he would want to get accomplished in the meeting
(2) which you could call an agenda, yes.
(3) Q: And those included meetings with the National
(4) Policy Forum?
(5) A: Correct.
(6) Q: Approximately how many of those did you prepare?
(7) A: I don't remember. Three, four. I don't remember.
(8) Q: What did you do with those after the meetings?
(9) A: The agendas?
(10) Q: Yes.
(11) A: Probably throw them out.
(12) Q: Were they done on your computer?
(13) A: I didn't have a computer.
(14) Q: Join the club, not a big club at this point, but a
(15) club.
(16) Were they kept in a file in any place?
(17) A: I don't remember. I didn't keep a file on NPF.
(18) Q: Do you know whether or not the chairman of the
(19) Republican party kept an NPF file?
(20) A: I do not know.
(21) Q: Who was your secretary at the time?
(22) A: Suzanne Scruggs.
(23) Q: Where does she reside?
(24) A: Where does she live?
(25) Q: Or even live, yes.

Page 71

(1) A: Around here, I believe.
(2) Q: Does she still work for the Republican party?
(3) A: No.
(4) Q: Was she your secretary during the entire time that
(5) you were at the RNC?
(6) A: No. I think she was for about a year, and then
(7) she moved over to be the chairman's scheduler.
(8) Q: Can you remember the subject matter of any of the
(9) meetings that you had with Mr. Baroody or Mr. Denning in
(10) Chairman Barbour's office?
(11) A: I can't remember the specific subject matter.
(12) They were usually about where they were going, the general
(13) direction.
(14) Q: Did the subject of fund-raising come up at any of
(15) those meetings?
(16) A: I don't remember, but I wouldn't be surprised if
(17) it did. I don't remember any specific incident.
(18) Q: At any time, were you privy to a conversation
(19) about raising money for the NPF from foreign sources?
(20) A: I had a conversation with the chairman prior to, I
(21) believe, one of the meetings with Baroody where there were a
(22) number of issues that I thought needed to be addressed in
(23) the meeting, one of which was his need to give the NPF some
(24) policy direction on how they could raise money for the NPF
(25) and how they could legally raise money from foreign

Page 72

(1) companies that had United States subsidiaries.
(2) Specifically, I remember Toyota being an incident that it
(3) either had come forward or they had brought forward, and I
(4) thought the chairman needed to give them some direction.
(5) Q: Why did you think that?
(6) A: Because they needed general direction on how they
(7) were going to handle this issue.
(8) Q: Handle what issue?
(9) A: The fact that foreign subsidiaries could legally
(10) give to the National Policy Forum.
(11) Q: Did you think that only American subsidiaries of
(12) foreign corporations could legally contribute to the
(13) National Policy Forum?
(14) A: No. I knew anybody could contribute to the
(15) National Policy Forum.
(16) Q: Did you believe that foreign corporations or
(17) foreign citizens could contribute to the National Policy
(18) Forum?
(19) A: I knew that there was a law of who and who
(20) couldn't contribute to the Republican National Committee,
(21) and that was what my job was to follow. I knew there was an
(22) issue about foreign subsidiaries wanting to contribute to
(23) the National Policy Forum, like Toyota, which he needed to
(24) give them direction on what to do about it.
(25) Q: How did you know that there were American

Page 73

(1) subsidiaries of foreign corporations who wanted to give
(2) money to the National Policy Forum?
(3) A: I don't remember. I don't remember if somebody
(4) brought it to my attention or if it was just a common-sense
(5) political issue that ought to be brought to his attention,
(6) which is what I did a lot of.
(7) Q: Was it your understanding that American
(8) subsidiaries of foreign corporations would be an American
(9) source of money or foreign source of money?
(10) MR. WEINSTEIN: I think this calls for a legal
(11) conclusion.
(12) MR. ROBBINS: I am not asking any question about
(13) the law.
(14) MR. WEINSTEIN: But you are, in a sense. I mean,
(15) if you want to try to rephrase that, maybe we can--how about
(16) this? If you make two or three shorter questions, maybe we
(17) can get to where you want to go, in a way that doesn't ask
(18) him to become a lawyer.
(19) MR. ROBBINS: It's in such a conciliatory spirit
(20) that I cannot turn that down.
(21) MR. WEINSTEIN: Well, we are here voluntarily.
(22) MR. ROBBINS: But under oath.
(23) MR. WEINSTEIN: Most definitely.
(24) BY MR. ROBBINS:
(25) Q: So let me ask you, was it your understanding--I'm

Page 74

(1) not asking you to give me a legal opinion because you're not
(2) a lawyer, I take it, and you're not here as an expert. Your
(3) understanding was that only American subsidiaries of foreign
(4) corporations could contribute, as distinct from foreign
(5) corporations themselves?
(6) MR. WEINSTEIN: I don't think this is relevant. I
(7) am going to direct the witness not to answer that question.
(8) MR. ROBBINS: All right. That's creative, and
(9) it's appropriate, then, under the circumstance.
(10) MR. WEINSTEIN: Please.
(11) BY MR. ROBBINS:
(12) Q: Did you have an understanding, sir, that foreign
(13) corporations could contribute to the National Policy Forum?
(14) MR. WEINSTEIN: Go ahead. Go ahead and answer
(15) that question.
(16) THE WITNESS: Yes.
(17) BY MR. ROBBINS:
(18) Q: What was your understanding?
(19) A: That the National Policy Forum was a 501(c)(3) or
(20) (4) and they could legally accept contributions.
(21) Q: From whom?
(22) A: From foreign companies with United States
(23) subsidiaries.
(24) Q: Did you have an understanding that the National
(25) Policy Forum could accept money from foreign citizens?

Page 75

(1) A: I didn't know if it could accept money from
(2) foreign citizens.
(3) Q: Did the subject ever come up?
(4) A: Not--it wasn't brought up to me.
(5) Q: Was it your understanding that only foreign
(6) companies which had American subsidiaries could contribute
(7) to the National Policy Forum?
(8) A: That was my understanding.
(9) Q: From what source did you derive that
(10) understanding?
(11) A: My general understanding of politics and the way
(12) this town works, the way a lot of non-profit organizations
(13) raise money.
(14) Q: Was there legal counsel that was utilized for the
(15) purpose of rendering advice about the National Policy
(16) Forum's activities?
(17) MR. WEINSTEIN: Legal counsel of NPF or RNC?
(18) MR. ROBBINS: Legal counsel of the St. Louis
(19) Cardinals, if necessary.
(20) MR. WEINSTEIN: I don't think the St. Louis
(21) Cardinals were involved.
(22) MR. ROBBINS: No, I didn't think so either, but
(23) what I mean to say is counsel means counsel.
(24) THE WITNESS: To the RNC?
(25) BY MR. ROBBINS:

Page 76

(1) Q: Any legal counsel, any lawyer.
(2) A: Well, I was under the impression that the National
(3) Policy Forum had counsel, and I knew the RNC had counsel.
(4) Q: My question was, do you have knowledge--or at
(5) least I think it was, at least I hope it was--of any
(6) occasion in which legal counsel was utilized in connection
(7) with the activities of the National Policy Forum?
(8) MR. WEINSTEIN: That's different than the first
(9) one. You're saying did NPF ever get legal counsel with
(10) regard to anything, or did NPF get legal counsel with regard
(11) to an opinion on this specific issue? This question is
(12) different than the previous one.
(13) BY MR. ROBBINS:
(14) Q: Did the National Policy Forum ever utilized
(15) counsel, to your knowledge, with respect to its fund-raising
(16) activities, period?
(17) A: They utilized counsel in respect to how they
(18) operated.
(19) Q: Who?
(20) A: I'm not--Linda Long was the counsel. I'm not sure
(21) what firm she's with. I think her name is Linda Long.
(22) Q: Did you ever communicate with Linda Long?
(23) A: Not regarding NPF, specifically. She was somebody
(24) I knew.
(25) Q: Well, did you ever communicate with her regarding

Page 77

(1) NPF at all?
(2) A: I don't believe so. I may have seen her
(3) somewhere, but I don't remember. That was a couple of years
(4) ago.
(5) Q: Did you ever seek legal counsel other than, for
(6) today's purpose, with respect to fund-raising on behalf of
(7) the National Policy Forum?
(8) A: No.
(9) Q: So, when you wrote this memo to Mr. Barbour, did
(10) you do so with the benefit of legal counsel or without it?
(11) A: No legal counsel.
(12) Q: This was just a memo that you did on your own?
(13) A: That's correct.
(14) Q: And whatever understanding you had about what
(15) sources could and could not contribute to the National
(16) Policy Forum, whatever information you had came from
(17) yourself? It didn't come from any consultation with a
(18) lawyer, correct?
(19) A: That's correct.
(20) Q: At any time, did anybody raise with you the
(21) subject of somebody who resided abroad contributing money to
(22) the National Policy Forum?
(23) A: No.
(24) Q: At any time, did anybody raise with you the
(25) subject of whether or not a foreign corporation could

Page 78

(1) contribute money?
(2) A: Well, I believe somebody brought the specific
(3) issue of Toyota to my attention.
(4) Q: Who was that?
(5) A: I do not remember, but that's what spurred me on
(6) to write this memo.
(7) Q: Tell me what the communication was, everything you
(8) can remember about it.
(9) A: I don't remember anything beyond the fact that
(10) somebody had mentioned to me that Toyota may have an
(11) interest in contributing to the Policy Forum, and I thought
(12) the chairman needed to give the Policy Forum leadership
(13) direction on how to deal with that.
(14) Q: Was it your understanding that Toyota, the foreign
(15) corporation, wanted to contribute money or one of its
(16) American subsidiaries?
(17) A: I figured it was one of the American subsidiaries.
(18) Q: An American corporation?
(19) A: Yeah.
(20) Q: So you would have regarded that as an American
(21) contribution?
(22) A: No, because I believed--I knew Toyota in the
(23) political sense as a foreign corporation that has United
(24) States subsidiaries.
(25) MR. PERRY: You know, I'm sorry to cut in. We

Page 79

(1) have a logistical problem because there is another
(2) deposition that starts at 10:30. If you could give us two
(3) minutes, I think we could sort of figure out how we're going
(4) to cover that.

(5) MR. ROBBINS: Yes, sure. I'm glad somebody else
(6) has that problem besides us.

(7) MR. WEINSTEIN: We're going to say. We don't have
(8) any other depositions.

(9) MR. PERRY: I know, but if you just give us two
(10) minutes, we're going to check, just for our purposes.

(11) MR. ROBBINS: Sure.

(12) [Recess.]

(13) BY MR. ROBBINS:

(14) Q: What was the first thing you remember doing at the
(15) RNC regarding the National Policy Forum?

(16) A: I remember there was a general discussion about
(17) who would be the right type of person to try to recruit to
(18) come in and run the thing.

(19) Q: Who was the discussion with?

(20) A: Probably with the chairman and myself.

(21) Q: So you and Chairman Barbour discussed who would be
(22) the right person to-

(23) A: Type of person.

(24) Q: Right. Type of person to do what?

(25) A: To take on tasks like starting up a think tank and

Page 80

(1) making it a success.

(2) Q: What were the criteria that you and he discussed?

(3) A: I don't remember what he discussed. I remember
(4) the criteria that I thought where somebody would have
(5) understood policy, understood politics, and understood the
(6) way Washington worked.

(7) Q: Did you interview people?

(8) A: No.

(9) Q: How did you select?

(10) A: I didn't select anybody.

(11) Q: Who was selected?

(12) A: Who was selected? Baroody was selected.

(13) Q: What was the process of his selection?

(14) A: I'm not 100-percent sure of that.

(15) Q: Chairman Barbour selected him?

(16) A: Chairman Barbour selected him, right.

(17) Q: Did you participate in that process?

(18) A: No.

(19) Q: Did anybody other than the chairman of the
(20) Republican party participate in the process of selecting the
(21) head of the National Policy Forum?

(22) A: Not that I'm aware of.

(23) Q: Was there any meeting with the chairman of the
(24) Republican party and Mr. Baroody prior to his selection?

(25) MR. WEINSTEIN: That he attended or that he knows

Page 81

(1) off?

BY MR. ROBBINS:

(3) Q: Any meeting. Was there any meeting?

(4) A: I'm sure there was a meeting.

(5) Q: Did you participate in it?

(6) A: Not to my recollection, no.

(7) Q: Money had to be provided from someplace to pay for
(8) Mr. Baroody's activities, correct?

(9) A: Monies had to be provided to start up the
(10) organization.

(11) Q: The monies that were provided to start up the
(12) National Policy Forum were provided by the Republican party?

(13) A: The Republican National Committee.

(14) Q: The Republican National Committee.

(15) Were you involved in that from the very beginning?

(16) A: Yes.

(17) Q: We talked about loan documents. Were there any
(18) other papers of any kind that were generated for the purpose
(19) of articulating the goal of the National Policy Forum?

(20) A: I believe there were some memos generated by the
(21) chairman to Baroody's spelling out what he saw his vision
(22) for what this organization would entail and do. I don't-I
(23) didn't write them. I don't remember. I don't have any of
(24) them.

(25) Q: Those were memos written by the chairman of the

Page 82

(1) Republican party to Mr. Baroody, correct?

(2) A: I believe there were. I don't think anybody would
(3) take a position like this without understanding a little
(4) more what it was going to entail.

(5) Q: Sure.

(6) A: So I believe there was some paper exchanged on
(7) what everybody understood to be the goals and priorities.

(8) Q: Among the paper that was exchanged were memos from
(9) the chairman of the Republican party to Mr. Baroody
(10) outlining what he wanted to have done?

(11) A: Yes.

(12) Q: You remember seeing some of those memos?

(13) A: I don't-I don't remember. I just remember
(14) knowing that it took place. I don't remember seeing them.

(15) Q: What ever happened to those memos?

(16) A: I don't-I didn't keep files on NPF.

(17) Q: What did Mr. Barbour, the chairman of the
(18) Republican party, articulate to you as the set of goals that
(19) he had in mind for the National Policy Forum?

(20) A: He wanted to set up a board of directors with
(21) co-chairmen for different policy issues on different themes,
(22) subjects, to be supported by a number of hearings held
(23) around the country, chaired by the co-chairmen, to seek
(24) input from the Americans with a goal of producing a document
(25) at the end of the year or two-year cycle, whatever it was,

Page 83

(1) to be able to put out what would better articulate the goals
(2) and priorities of the Republican party.

(3) This was a period when we were out of power and
(4) felt that it was a need to fill that void.

(5) Q: Was it your understanding that the purpose of the
(6) National Policy Forum was to assist the Republican party?

(7) A: I didn't say to assist. That's not the right
(8) word.

(9) Q: I thought you weren't going to agree with that.

(10) A: There are a number of organizations that are
(11) like-minded, like the Republican party, that believe in the
(12) same policies and principles as we do, as we did when we ran
(13) the Republican party.

(14) Q: Such as? What comes to mind?

(15) A: Such as groups that are tax reform groups. That's
(16) what comes to my mind.

(17) Q: Did the Republican party fund any of those?

(18) A: Fund any of them during 1993 and 1994?

(19) Q: Yes.

(20) A: Not that I'm aware of.

(21) Q: '95?

(22) A: I was gone. I don't know.

(23) Q: '96?

(24) A: I was running the Dole campaign.

(25) Q: So, in any event, the only organization that you

Page 84

(1) can think of that was like-minded, to use your phrase, that
(2) the Republican National Committee funded during the period
(3) when you were at the Republican National Committee was NPF?

(4) A: I believe that's the case, yes.

(5) Q: So would you agree that maybe there was a close
(6) relationship between the Republican National Committee and
(7) the NPF than any of these other organizations?

(8) A: Yes.

(9) Q: Because it was created by the Republican National
(10) Committee, unlike some of these other organizations?

(11) A: No, because it was created by the chairman of the
(12) Republican National Committee.

(13) Q: And it was funded by the Republican party?

(14) A: The startup money was being funded by the
(15) Republican party.

(16) Q: Several million dollars worth?

(17) A: That's correct.

(18) Q: So can we agree that one of the reasons that the
(19) relationship between the National Policy Forum and the RNC
(20) is closer than that between the RNC and some of these tax
(21) groups-is that, A, it was created by the chairman of the
(22) Republican National Committee and, B, it was provided
(23) several million dollars worth of money?

(24) A: For startup funds, that's correct.

(25) Q: During the time that you were at the RNC which was

Page 85

[1] February of '93 through February of '95, is it the case that
[2] most of the money, most of the NPF's budget was supplied by
[3] the RNC?

[4] A: Well, I'm not fully knowledgeable on all the money
[5] that the NPF was spending, but I believe that the bulk of
[6] the money was supplied by the RNC to get the thing started,
[7] and how it operated, I'm not 100-percent sure. I was
[8] focussed on campaigns.

[9] Q: Sure. My question, though, is, I guess, that in
[10] '93, '94, until February of '95, to your knowledge, most of
[11] the NPF's money was supplied by the Republican National
[12] Committee?

[13] A: Yes.

[14] Q: Before approving the infusion of more money from
[15] the RNC to the NPF over the course of '93, '94, and over
[16] '95, did you ever ask the NPF for its fund-raising records?

[17] MR. WEINSTEIN: I believe you asked that question,
[18] Counselor.

[19] MR. ROBBINS: I'm not sure I did, but in any
[20] event, I don't remember the answer.

[21] THE WITNESS: I don't remember asking for their
[22] fund-raising records, no.

[23] BY MR. ROBBINS:

[24] Q: Did you seek to get information about how they
[25] were doing on fund-raising, specifically?

Page 86

[1] A: I would seek, as they would ask for money, how
[2] they were going to pay it back.

[3] Q: Orally?

[4] A: Yes.

[5] Q: Did you ever ask to look at any documents they had
[6] which would reflect either what money they had raised or
[7] what their prospects were for raising money?

[8] A: Not that I remember, no. That doesn't mean I
[9] didn't, but I don't remember.

[10] Q: You have no memory of doing so?

[11] A: No.

[12] Q: So this money would be loaned by the RNC to the
[13] National Policy Forum without any request that you're aware
[14] of for actual documentation of their balance sheets, what
[15] their prospects for getting specific monies were; is that
[16] correct?

[17] A: That's correct.

[18] MR. WEINSTEIN: I believe you've-well, go ahead,
[19] sir.

[20] BY MR. ROBBINS:

[21] Q: The answer to that is?

[22] A: That's correct.

[23] Q: Did you ever ask anybody at the National Policy
[24] Forum whether they had any written fund-raising plan of
[25] their own?

Page 87

[1] A: I don't remember if I ever asked, but I took it
[2] for granted that they did.

[3] Q: Did you ever see one?

[4] A: I don't remember ever seeing one.

[5] Q: So at no time that you can remember prior to these
[6] RNC approvals of more and more cash to the NPF did you at
[7] least see any fund-raising plan for the NPF?

[8] A: Not that I remember, no.

[9] Q: Or ever ask to see one, correct?

[10] A: That's correct.

[11] MR. ROBBINS: Let's have the first document marked
[12] as an exhibit.

[13] (Reed Deposition Exhibit No. 1

[14] marked for identification.)

[15] MR. ROBBINS: Now, may I show him the actual
[16] exhibit? Is there any reason why I can't, just to show him
[17] the document which was marked as Exhibit 1?

[18] MR. WEINSTEIN: Is that the actual document?

[19] THE WITNESS: Do you want this one?

[20] BY MR. ROBBINS:

[21] Q: Yes. You are actually looking at Exhibit 1. Can
[22] you identify this after you have had a chance to read it?

[23] (Witness perusing document.)

[24] THE WITNESS: No.

[25] BY MR. ROBBINS:

Page 88

[1] Q: Do you have any recollection of an RNC staff
[2] meeting in or around June of '94 covering these subject
[3] matters?

[4] A: No, I don't. Whose document is it?

[5] Q: I don't know. I personally don't know.

[6] This is Bates-stamped R056377 through 79. Of
[7] course, I'm also the other one-you and I also are the only
[8] people in the room who don't know how to work a computer.
[9] Listening to America, what was that?

[10] A: Listening to America was the theme that was
[11] developed by the National Policy Forum to title the forums
[12] that were held on the road, which was going to culminate
[13] with the publication of a document, as I mentioned earlier,
[14] at the end of the process called Listening to America, which
[15] I believe was ultimately published into a book.

[16] Q: Did you have any role in the development of that
[17] idea? Don't be modest.

[18] A: Not really, besides a strategic advice role with
[19] the chairman, as I did every day on everything, but I wasn't
[20] involved in the building of it, no.

[21] Q: What was your role? What was the strategic advice
[22] role?

[23] A: On the direction that the party ought to be taking
[24] and the type of issues we ought to be talking about.

[25] Q: Well, did you speak with the chairman about the

Page 89

[1] Listening to America idea?

[2] A: Well, I'm sure I did.

[3] Q: Did you speak to him about the desirability of
[4] having it?

[5] A: About having it? The book? The forums? What?

[6] Q: Well, any of them.

[7] A: Well, I think it was more he was speaking to me of
[8] his desirability to have it.

[9] Q: His desire to have it?

[10] A: Yes.

[11] Q: So the chairman would indicate to you that he
[12] thought the National Policy Forum should have a Listening to
[13] America program, for lack of a better word?

[14] A: Correct.

[15] Q: Which would involve forums around the country and
[16] then the ultimate publication of a book?

[17] A: Right.

[18] Q: So did he come up with the idea?

[19] A: I'm not sure who came up with the idea. I'm not
[20] 100-percent sure.

[21] Q: But in any event, Mr. Barbour would speak to
[22] you-you remember him speaking to you about his desire to
[23] have this?

[24] A: Yes.

[25] Q: Did you play any role in implementing it?

Page 90

[1] A: No, besides what I've told you about today with
[2] the lending the money. I didn't have any day-to-day role
[3] with it, no. I was managing the committee.

[4] Q: Whether it was day to day or not, did you speak to
[5] anybody at the NPF, even from time to time, about the
[6] progress of the Listening to America program? "Program" may
[7] not be the right word.

[8] A: I'm sure I did about making sure things were going
[9] on. I'm sure I did.

[10] Q: Did you talk to anybody at the NPF about making
[11] Listening to America forums available to GOP candidates?

[12] A: I don't remember speaking-I mean, that was kind
[13] of the common sense. So I don't know if it was necessary
[14] for me to have that discussion.

[15] Q: Was it common sense that one of the purposes of
[16] these programs was to assist GOP candidates?

[17] A: No. It wasn't viewed as an opportunity to assist
[18] GOP candidates. Even, if I'm not mistaken, Democrats were
[19] invited to be involved in the forums on the road and to
[20] speak.

[21] Q: Fair enough. Were there discussions at RNC staff
[22] meetings about the National Policy Forum?

[23] A: Yes.

[24] Q: By the way, were there regular RNC staff meetings,
[25] just to find out how woeful our own procedures for staff

Page 91

[1] meetings are?
[2] MR. WEINSTEIN: Are you talking about--you may
[3] want to differentiate between--when you say staff, do you
[4] mean everybody in the building? What do you mean?
[5] BY MR. ROBBINS:
[6] Q: When I asked when you were in staff meetings, what
[7] were you thinking of when you said yes to staff meetings?
[8] A: I had a weekly senior staff meeting.
[9] Q: Involving the individuals you mentioned?
[10] A: The people--that's correct.
[11] Q: Was National Policy Forum discussed at those
[12] meeting?
[13] A: Yes.
[14] Q: Were those meetings with National Policy Forum--
[15] A: No.
[16] Q: --representatives?
[17] The meetings, these staff meetings at which
[18] National Policy Forum would come up, were solely RNC staff
[19] meetings?
[20] A: Right, and it usually came up under the auspices
[21] of somebody asking a question about it because a member of
[22] the national committee was asking them a question about what
[23] it was doing.
[24] Q: Was there an effort to make members of the
[25] Republican National Committee aware of the activities of the

Page 92

[1] National Policy Forum?
[2] A: There were a number of members of the committee
[3] that were involved in the National Policy Forum. It was an
[4] agenda item at one of the--I believe it was a summer
[5] meeting.
[6] Q: Of the Republican National Committee?
[7] A: Of the Republican National Committee, where I even
[8] think Baroody spoke and discussed the goals, so yes. The
[9] answer is yes.
[10] Q: Apart from what you have said, was there any
[11] institutionalized process that was put in place for
[12] informing Republican National Committee members or
[13] Republican donors about the activities of the National
[14] Policy Forum?
[15] A: Not that I can remember. I mean, I know that our
[16] counsel at the staff meetings I had made clear from the
[17] get-go that these were two separate entities, and everybody
[18] on my RNC team was understanding it was a separate entity.
[19] Q: Was there any document--do you have a recollection
[20] of your conversation?
[21] A: I remember it was brought up in one of the staff
[22] meetings early on because we needed to set the record
[23] straight. I don't remember if there was a document that was
[24] put out by the counsel on it, but there could be.
[25] Q: Do you have any memory of any document which

Page 93

[1] sought to explain any separation that had to be followed
[2] between the activities of the Republican National Committee
[3] and the National Policy Forum?
[4] A: I don't have facilities of the document, but I
[5] would be surprised if there was not some type of a
[6] communique put out like that to the staff.
[7] Q: Was it your understanding that--
[8] A: Because it was a new staff, too, it was important
[9] to have had that done.
[10] Q: Was it your understanding that the National Policy
[11] Forum could raise money from sources that could not
[12] permissibly contribute to the RNC?
[13] A: It was my understanding that the National Policy
[14] Forum could raise sources legally from anybody because of
[15] the way it was set up and its tax status.
[16] Q: And you understood the Republican National
[17] Committee could not raise money from anybody, correct?
[18] A: Yes.
[19] Q: You understood the Republican National Committee,
[20] for example, could not raise certain kinds of foreign money?
[21] A: Things that were illegal, we did not do. That's
[22] correct.
[23] Q: But your understanding was that the National
[24] Policy Forum could raise money from anybody, you said?
[25] A: My understanding was that the National Policy

Page 94

[1] Forum could raise money from anybody legally. Correct.
[2] Q: Was it your understanding that there were any
[3] limitations--
[4] MR. WEINSTEIN: I think this has been asked and
[5] answered. I'm going to object based upon asking for a legal
[6] conclusion.
[7] MR. ROBBINS: I haven't even asked the question.
[8] MR. WEINSTEIN: Well, but you're asking him to
[9] define what his understanding is of Federal campaign finance
[10] laws as it applied to NPF.
[11] MR. ROBBINS: Let me tell you something, Mr.
[12] Weinstein. You have the benefit of not having been at a
[13] hundred depositions that I have been at, and your position
[14] about what I can ask if, in fact, you're going to maintain
[15] this position is entirely at variance with those of the
[16] Majority here.
[17] Let me ask the question.
[18] MR. WEINSTEIN: Let me make it really clear. I
[19] haven't been to these other depositions--
[20] MR. ROBBINS: I know that.
[21] MR. WEINSTEIN: --and whether that is a benefit or
[22] a handicap is really irrelevant to me.
[23] What I am saying is you are asking this witness
[24] for a legal conclusion, and it's not appropriate, in my
[25] view, and you've asked and he's answered that type of

Page 95

[1] question previously.
[2] MR. ROBBINS: You may give whatever instruction.
[3] Let me ask the question and--
[4] MR. WEINSTEIN: That's fine.
[5] MR. ROBBINS: --we will take it up and we will get
[6] a ruling.
[7] MR. WEINSTEIN: That's fine.
[8] MR. ROBBINS: If that's what you want to do,
[9] that's what we got to do.
[10] BY MR. ROBBINS:
[11] Q: Was it your understanding that there were any
[12] limitations at all on the sources who could contribute to
[13] the National Policy Forum?
[14] MR. WEINSTEIN: If he had an understanding.
[15] THE WITNESS: My understanding was that the
[16] National Policy Forum was going to raise money legally.
[17] BY MR. ROBBINS:
[18] Q: I appreciate that, but that's not my question.
[19] Was it your understanding, sir, that there were
[20] any particular limitations on the sources who could
[21] contribute to the National Policy Forum?
[22] A: My understanding was, legally, the Policy Forum
[23] could raise money from anybody and any amount.
[24] Q: Fair enough. Was it your understanding that the
[25] same applied to the Republican National Committee?

Page 96

[1] A: No. I understood the Republican National
[2] Committee had different rules and regulations and filed
[3] forms and filed them on time. It was a totally different
[4] process.
[5] Q: Fair enough. Can we agree, therefore, that there
[6] were--that your understanding back then was that there were
[7] sources of potential money that could go to the National
[8] Policy Forum that could not go to the RNC?
[9] A: Yes.
[10] Q: Who did those include, to your understanding, at
[11] that period of time?
[12] A: Anybody that didn't want to give to the Republican
[13] National Committee.
[14] Q: Or anybody who couldn't give to the Republican
[15] National Committee, correct?
[16] A: Or couldn't--no, I wouldn't say it that way. I
[17] would say anybody that didn't want to give to the Republican
[18] National Committee could give to the NPF, or they could give
[19] to both.
[20] Q: Did you have an understanding that foreign
[21] corporations--not American subsidiaries, but foreign
[22] corporations--could give to the RNC?
[23] A: No. I thought they couldn't.
[24] Q: Did you have an understanding that foreign
[25] corporations could give to the National Policy Forum, sir?

Page 97

(1) A: I have since understood that they can.
(2) Q: Did you understand back then that they could?
(3) A: I had never--this is new water for me. I had
(4) never covered it back then.
(5) Q: At any time in '93 or '94, did you have
(6) information that a foreign corporation could contribute to
(7) the National Policy Forum?
(8) A: Yes.
(9) Q: From whom?
(10) A: From my understanding of learning this issue.
(11) Q: During that period of time?
(12) A: During that period of time.
(13) Q: So we're clear, in '93, '94, you knew that--
(14) A: A foreign-foreign corporation could legally give
(15) money to the NPF. That's correct.
(16) Q: And you knew that it couldn't to the RNC, correct?
(17) A: Yes.
(18) Q: And that subject came up at meetings, did it not?
(19) A: I don't remember it coming up at meetings, no.
(20) Q: Did you ever have any conversation, sir, with
(21) anybody at the Republican National Committee about the fact
(22) that a foreign corporation could contribute to the
(23) National--
(24) MR. WEINSTEIN: This is--this--
(25) MR. ROBBINS: I'm not--I'm--sir, I'm not finished

Page 98

(1) yet.
(2) MR. WEINSTEIN: Well, I'm interjecting, and I'm
(3) going to say that I don't think this is fair to the witness
(4) because you ask him the same question every half hour in a
(5) bit of a different way.
(6) He spoke to you about Toyota. He spoke to you
(7) about a meeting that he had, and now you go back and you ask
(8) the same question three or four different times in every
(9) half-hour increment to try to trap the witness. I just
(10) don't think it's fair, sir.
(11) MR. ROBBINS: Are you all set?
(12) MR. WEINSTEIN: I am all set.
(13) MR. ROBBINS: Okay.
(14) BY MR. ROBBINS:
(15) Q: My question is, did you have any communication
(16) with anybody in '93, '94 about the fact that foreign
(17) corporations could contribute to the National Policy Forum?
(18) MR. WEINSTEIN: Are you saying in addition to the
(19) conversations that he's already identified for you or
(20) including those?
(21) BY MR. ROBBINS:
(22) Q: Do you understand my question?
(23) A: Let's hear your question again.
(24) Q: Did you have any communication with anybody in the
(25) calendar years 1993 or 1994 about the fact that foreign

Page 99

(1) corporations could contribute to the National Policy Forum?
(2) A: Yes.
(3) Q: Who?
(4) A: I remember having a conversation with the
(5) chairman, and I remember having a conversation with a lawyer
(6) to explain to me. So I don't remember who.
(7) Q: When did your conversation take place with the
(8) chairman?
(9) A: I don't remember, but I--
(10) Q: Was it one--
(11) A: --remember it was early in the process because I
(12) thought he needed to give the staff at the NPF some policy
(13) direction on how to handle this issue.
(14) Q: In the conversations you had with the chairman,
(15) Chairman Barbour, about the fact that foreign money
(16) could--foreign corporations could contribute legally--
(17) A: Could legally contribute.
(18) Q: --to the National Policy Forum, what did you say
(19) and what did he say?
(20) A: What I remember saying was that he needed to make
(21) a policy decision and give the NPF some direction on how to
(22) handle this because I believe a company like Toyota has
(23) either approached or has been approached about giving.
(24) Q: What did he say to you?
(25) A: He said we can legally take money. The NPF can

Page 100

(1) legally take money from foreign corporations.
(2) Q: Did he say why?
(3) A: No, because he said it was legal.
(4) Q: Did you have any conversation with him about
(5) efforts to raise such money?
(6) A: No.
(7) Q: Did he ever indicate to you that he expected such
(8) efforts to be undertaken?
(9) A: I don't remember.
(10) Q: Do you have any recollection of any conversation
(11) with anybody about efforts to raise foreign money for the
(12) National Policy Forum?
(13) A: No.
(14) MR. WEINSTEIN: During what time period?
(15) MR. ROBBINS: From the year of our Lord--
(16) THE WITNESS: No.
(17) MR. ROBBINS: --until the present, excluding--
(18) THE WITNESS: The answer is no.
(19) MR. ROBBINS: --conversations with counsel.
(20) BY MR. ROBBINS:
(21) Q: Sorry?
(22) A: The answer is no.
(23) Q: Did you ever have any communication with anybody
(24) about efforts to raise money from foreign citizens?
(25) A: Not that I remember.

Page 101

(1) Q: Have you ever heard of the Young Brothers?
(2) A: Yes.
(3) Q: What is Young Brothers?
(4) A: I've just read about Mr. Young in the paper, so a
(5) company from Taiwan, I believe, or Hong Kong.
(6) Q: Did you ever have any communication while you were
(7) at the RNC about Young Brothers?
(8) A: No, except for I was notified that he was going to
(9) be making a contribution to the Policy Forum.
(10) Q: Who notified you of that?
(11) A: I don't remember.
(12) Q: Did you understand him to be a citizen of a
(13) different country?
(14) A: I didn't know who he was. I didn't understand it
(15) with anything.
(16) Q: Do you remember how much he contributed?
(17) A: I remember it was well over a million dollars.
(18) Q: Now, that, by most of our standards, would be a
(19) relatively significant contribution.
(20) A: Yeah.
(21) Q: And can we agree that a contribution of that size
(22) would have generated some discussion at the RNC?
(23) MR. ROBBINS: A contribution to the RNC of that
(24) size or a contribution to the NPF of that size?
(25) MR. ROBBINS: That's a good point.

Page 102

(1) BY MR. ROBBINS:
(2) Q: Was it somebody at the NPF or somebody at the RNC
(3) who told you about the contribution by Mr. Young?
(4) A: Oh, I'm sure it was somebody from the NPF.
(5) Q: And this was while you were executive director of
(6) the RNC, correct?
(7) A: This was when we were in the middle of the '94
(8) election cycle.
(9) Q: So sometime when you were in the middle of the
(10) 1994 election cycle, you are told that Mr. Young or the
(11) Young Brothers, one or the other, was going to contribute
(12) more than a million dollars to the NPF?
(13) A: That's correct.
(14) Q: This was at a time when you were in the middle of
(15) trying to get candidates elected to Congress?
(16) A: And governors and the Senate and courthouses and
(17) up and down the ticket. That's correct.
(18) Q: That was your activity at that point?
(19) A: That was my activity.
(20) Q: Your central concern was trying to get Republican
(21) candidates elected, right?
(22) A: That's correct.
(23) Q: In the middle of this, you are informed that Mr.
(24) Young or Young Brothers is going to contribute more than a
(25) million dollars to the National Policy Forum?

Page 103

(1) A: Sometime during that period, yeah.
(2) Q: Why was that of interest to you, if it was?
(3) A: Well, because it was of interest to me because the
(4) biggest, largest creditor to the Republican National
(5) Committee would then be able to repay its loan.
(6) Q: And you needed the money--the RNC needed the money
(7) to help do what you were primarily charged with doing which
(8) was getting candidates elected?
(9) MR. WEINSTEIN: Do you want to define "need"?
(10) They needed the money or they wanted the money?
(11) MR. ROBBINS: Do you want to let the witness
(12) answer the question, Mr. Weinstein? Because otherwise, it
(13) is going to seem to unreasonable people as though you're
(14) trying to interfere in the deposition process. I would
(15) never, of course, have that--draw that conclusion.
(16) MR. WEINSTEIN: Sure. Well, I appreciate your
(17) saying that. What I'm trying to do is create a record that
(18) has clear questions with clear answers.
(19) MR. ROBBINS: Okay. Well, if the witness doesn't
(20) understand my question, you should--
(21) THE WITNESS: Why don't you ask your question
(22) again?
(23) BY MR. ROBBINS:
(24) Q: Sure. At the time when this million dollars came
(25) into NPF, this was of interest to you because the NPF was

Page 104

(1) the RNC's largest creditor, correct?
(2) A: Single largest creditor.
(3) Q: Single largest creditor, correct?
(4) A: Correct.
(5) MR. WEINSTEIN: I think debtor, actually, would be
(6) the correct--
(7) MR. ROBBINS: True.
(8) MR. WEINSTEIN: The NPF was the debtor. The RNC
(9) was the creditor.
(10) MR. ROBBINS: This is one of those instances in
(11) which I actually value your--isn't that nice?
(12) MR. WEINSTEIN: I will appreciate this moment for
(13) some time.
(14) THE WITNESS: At least until lunch time.
(15) BY MR. ROBBINS:
(16) Q: All right. So this came at a time when the
(17) National Policy Forum was the Republican National
(18) Committee's largest debtor. Mr. Weinstein is correct.
(19) A: Correct.
(20) Q: And that was of interest to you because you wanted
(21) to see if the RNC could get paid back?
(22) A: Correct.
(23) Q: And use the money for electing Republican
(24) candidates?
(25) A: Use the money to operate the Republican National

Page 105

(1) Committee.
(2) Q: At a time when it was trying actively to get
(3) candidates elected, right?
(4) A: Well, they do that every day, yes.
(5) Q: And this money, you said, came in at a time when
(6) you were in the middle of that effort, correct?
(7) A: It was sometime before the election in '94. I
(8) don't remember exactly when.
(9) Q: Well, didn't you just say earlier that it came in
(10) the middle of the election campaign?
(11) A: If that's what you said I said, I did.
(12) Q: Whether or not I say you said it, did it come in,
(13) in the middle of the election campaign?
(14) A: It came in the latter part of 1994.
(15) Q: When the GOP was involved in trying to get
(16) Republican candidates elected?
(17) A: Correct.
(18) Q: This was of interest to you because the GOP wanted
(19) to get repaid its money during this period of time, correct?
(20) A: Wanted to get repaid the money, correct.
(21) Q: And did you have any inkling that this
(22) contribution was in the offing, if I can use the word?
(23) A: What does that mean?
(24) MR. WEINSTEIN: Fair statement.
(25) MR. ROBBINS: Fair comeback.

Page 106

(1) BY MR. ROBBINS:
(2) Q: Did you have any idea before the contribution came
(3) in that somebody was working on obtaining it?
(4) A: Well, I was under the impression that somebody was
(5) working on paying us back our loan. This wasn't a one-way
(6) loan. We were going to get paid back.
(7) Q: Well, apart from that, did you know that somebody
(8) at the NPF was in contact with Mr. Young or Young Brothers
(9) about the possibility of providing the money to repay--
(10) A: No.
(11) Q: --the GOP's loan?
(12) A: No.
(13) Q: Were you aware that somebody at the NPF was trying
(14) to get money during the latter half of '94, so as to pay
(15) back the GOP loan?
(16) A: I was aware that there was a Finance staff at the
(17) NPF whose job it was to raise money throughout 1994 and to
(18) pay us back at the earliest possible convenience.
(19) Q: Your testimony is that that--under oath--that
(20) that's the only recollection that you have of any efforts
(21) being made to get money in the last half of '94 to pay back
(22) the GOP?
(23) MR. WEINSTEIN: I don't understand that question.
(24) What's the only effort?

BY MR. ROBBINS:

Page 107

(1) Q: Just sort of general, you understood they had a
(2) Finance staff and that--
(3) A: Yeah.
(4) Q: --they were always a-okay.
(5) Were you kept apprised at all of any contacts that
(6) the NPF was engaged in for fund-raising purposes?
(7) A: Not--no, not on a regular basis. I would hear
(8) things occasionally.
(9) Q: Was there any discussion--was there any
(10) communication you had with anybody in the last four or five
(11) months of 1994 about the need to pay back the NPF loan?
(12) MR. WEINSTEIN: About the need by who?
(13) THE WITNESS: Communications with you?
(14) BY MR. ROBBINS:
(15) Q: Anybody.
(16) A: Yeah. I had them with the chairman.
(17) Q: Okay. And--
(18) A: And I would--I would occasionally be aware of
(19) donors that were coming through that would be making
(20) contributions.
(21) Q: To the NPF?
(22) A: Or to the RNC.
(23) Q: Let me see if I can narrow these questions a
(24) little bit.
(25) MR. WEINSTEIN: Are we done with this document,

Page 108

(1) sir?
(2) MR. ROBBINS: No.
(3) MR. WEINSTEIN: Okay.
(4) BY MR. ROBBINS:
(5) Q: In the last three or four or five months of 1994,
(6) did you have conversations with the chairman of the
(7) Republican party about obtaining--about getting repayment of
(8) the RNC's outstanding loans to the National Policy Forum?
(9) A: Yes.
(10) Q: Can you remember any of those conversations?
(11) A: Nothing beyond the fact that I would keep him
(12) apprised of what the outstanding loan amount was
(13) Q: Would you do so on a regular basis throughout the
(14) time that you were at the RNC?
(15) A: I don't remember.
(16) Q: But you do remember that in the last three or four
(17) or five months of 1994, you had those conversations with Mr.
(18) Barbour, correct?
(19) A: Yes.
(20) Q: Did Mr. Barbour indicate to you that he wanted
(21) efforts undertaken to see if NPF could pay back that loan?
(22) A: He didn't indicate those efforts to me.
(23) Q: Did he indicate to you that he wanted the loan
(24) repaid?
(25) A: Of course. Yes, he did.

Page 109

[1] Q: And did you and he discuss the fact that money
[2] would come in handy the last half of 1994 for these election
[3] efforts?
[4] A: We discussed money every day because we were
[5] making decisions every day on what races to fund and what
[6] races not to fund.
[7] Q: And because--okay. Fair enough. Can we agree
[8] that the subject of available funds for the GOP to spend in
[9] its efforts to elect or re-elect candidates was a constant
[10] subject of conversation between you and the chairman in the
[11] second half--
[12] MR. WEINSTEIN: Mr. Robbins--
[13] MR. ROBBINS: --of 1994?
[14] MR. ROBBINS: It may be helpful, in terms of what
[15] you are getting at, to differentiate between different types
[16] of money because in this process, all money is not created
[17] equal. So if you want to probe the witness' knowledge, it
[18] may be helpful to differentiate between the different types
[19] of money available, because some money is not available to
[20] go directly to candidates and some money is, and there is
[21] some combination thereof. So your question, while appearing
[22] to be precise, is, in fact, a little vague.
[23] MR. ROBBINS: Excuse me for a second. All right.
[24] BY MR. ROBBINS:
[25] Q: Can you answer my question?

Page 110

[1] A: What's the question?
[2] MR. ROBBINS: Would you read back my question?
[3] [The reporter read back the requested portion of
[4] the record.]
[5] THE WITNESS: Yes.
[6] BY MR. ROBBINS:
[7] Q: And inasmuch as television advertising is done
[8] intensively in the last couple of months of the election,
[9] the need to get that money, to get money that's available to
[10] spend on that becomes more acute during that period of time?
[11] A: That's correct.
[12] Q: And was it in the context of conversations that
[13] you had with Mr. Barbour about the demand of running these
[14] campaigns all over the place, or helping to run these
[15] campaigns all over the place, that you had these discussions
[16] with him about getting the NPF loan repaid?
[17] A: No, I wouldn't make that statement. I was
[18] briefing him every day on the status of the different races,
[19] who was up, who was down, what we were doing, what we should
[20] be doing. And I don't think it's fair to say that every day
[21] we were talking about the outstanding loan owed to the RNC
[22] by the NPF.
[23] Q: Fair enough. I didn't mean to suggest by my
[24] question--
[25] A: You suggested at every meeting it was a constant

Page 111

[1] thing.
[2] Q: That was a mistake on my part. Whether or not it
[3] was constant, was it in the context of discussions about the
[4] need for money for these races that you spoke to Mr. Barbour
[5] about the need to get the NPF loan repaid?
[6] A: No, it really wasn't because it really--there
[7] really isn't a direct context between the money that we were
[8] owed and the money that we were putting out to races.
[9] Q: Why not?
[10] A: Because most of the money we were putting out to
[11] races was Federal money with a 35 percent match of soft
[12] money.
[13] Q: Do you know--
[14] A: And this loan was a complete soft money loan.
[15] Q: Do you know what was done--after Mr. Young of
[16] Young Brothers made his contribution in excess of \$1
[17] million, was there repayment of part of the debt?
[18] A: To the RNC?
[19] Q: Yeah.
[20] A: I'm sure there was.
[21] Q: Of--
[22] A: I don't remember when or how much, but I'm sure it
[23] was.
[24] Q: Of an amount in excess of \$1 million?
[25] A: I would imagine--and I do not remember--that they

Page 112

[1] kept some to operate so they wouldn't have to come back for
[2] a loan a week later.
[3] Q: But part of the money came back to the RNC?
[4] A: Sure.
[5] Q: And would have been used for what purposes? Would
[6] have gone into what account?
[7] A: It would have gone to whatever account it was lent
[8] from, and it--
[9] Q: What account was it lent from?
[10] A: It was lent from the RNSEC account. It was used
[11] for general operating procedures. Republican National State
[12] Election Committee account, or something like that.
[13] Q: So the money that went from the--that was provided
[14] by the RNC to National Policy Forum came from an account
[15] which is called RNSEC?
[16] A: R-N-S-E-C. I believe.
[17] Q: And what is that again?
[18] MR. WEINSTEIN: S-E-C.
[19] THE WITNESS: Republican National State Election
[20] Committee. I believe that's what the acronym stands for.
[21] BY MR. ROBBINS:
[22] Q: And what can be paid for by monies from that
[23] account? Can you put that in a different, in a non-
[24] germanic--
[25] A: Legally? Legal party building activities.

Page 113

[1] Q: Including what kinds of things?
[2] A: Staff, headquarters, overhead. Anything that has
[3] to do with the election of a Federal candidate has to be
[4] paid with a portion out of that account. I believe it was
[5] 35 percent out of that account and 65 percent out of the
[6] hard account.
[7] Q: So--and you're talking to somebody who is not a
[8] campaign finance expert. I'm neither ashamed nor proud to
[9] admit that. That account, the RNSEC account, the account
[10] that was used to provide money to the National Policy Forum,
[11] and into which some of the monies came back from the
[12] National Policy Forum, can be used to help candidates for
[13] Congress?
[14] A: A percentage of it can. A small percentage of it
[15] can.
[16] Q: What percentage?
[17] A: I believe it was 35 percent in a Federal election
[18] year; 65-35 is the split.
[19] Q: And in addition to the 35 percent of these monies
[20] that can be used to help candidates for Congress, this fund
[21] can be used for what?
[22] A: General party building activities.
[23] Q: Such as?
[24] A: Which include overhead, staff, things that do not
[25] directly affect the election of a candidate. There are very

Page 114

[1] straight laws on this. We have a very sophisticated group
[2] of lawyers and accountants that, before any check is sent
[3] out to anybody, it's reviewed and properly broken down.
[4] Q: You used the word "direct." Will you agree with
[5] me that monies from--even those monies from this account
[6] which cannot be used to directly assist candidates for
[7] Congress can be in--are likely to be of indirect benefit to
[8] them?
[9] MR. WEINSTEIN: What is likely to be an indirect
[10] benefit other than--
[11] THE WITNESS: The percentage of the account.
[12] MR. WEINSTEIN: We're at cross--you're saying the
[13] percentage to be used--
[14] MR. ROBBINS: That's the beauty of letting the
[15] witness answer questions. Mr. Weinstein.
[16] MR. WEINSTEIN: But I want a clear record. I
[17] recognize that you're not particularly knowledgeable in the
[18] campaign finance area, but I want a clear record of exactly
[19] what's--
[20] MR. ROBBINS: Okay.
[21] MR. WEINSTEIN: --because it is a technical area.
[22] BY MR. ROBBINS:
[23] Q: Do you understand my question?
[24] A: No. Why don't you say your question--
[25] MR. ROBBINS: Would you ask my question?

Page 115

[1] [The reporter read back the requested portion of
[2] the record.]
[3] THE WITNESS: I have a difficult time defining
[4] what you mean by indirectly to the candidates.
[5] BY MR. ROBBINS:
[6] Q: Okay. Well, let's go through this. The 35
[7] percent of the monies in this account that can directly aid
[8] congressional candidates--let's put to the side one moment.
[9] A: Okay.
[10] Q: And 35 percent of \$1 million obviously is
[11] \$350,000, which is a significant amount of money; correct?
[12] A: If--yes.
[13] Q: Now, of the 65 percent that is remaining to be
[14] used other than directly to assist candidates, that money
[15] can be used to indirectly help them; correct?
[16] A: It can legally be spent to help elect Republican
[17] candidates.
[18] Q: Yes.
[19] A: Yes. I'm getting confused on your direct and
[20] indirect definitions, though.
[21] Q: Can we agree that monies from the RNSEC account
[22] were used to either directly or indirectly help Republican
[23] candidates for Congress in accordance with the laws?
[24] A: Yes, we can.
[25] Q: And so that if--to the extent that account could

Page 116

[1] be replenished or built up during the course of the last
[2] couple of months of 1994, that would inure to the benefit of
[3] Republican candidates?
[4] MR. WEINSTEIN: See, that calls for a legal
[5] conclusion because depending on the matching between the
[6] hard and soft dollars, that may or may not legally be
[7] correct.
[8] BY MR. ROBBINS:
[9] Q: Would you answer my question, please?
[10] A: I can answer it easier than that. That account
[11] had a surplus of money. It always did.
[12] Q: So--
[13] A: Large surplus of money.
[14] Q: Meaning what?
[15] MR. WEINSTEIN: You're saying RNSEC?
[16] THE WITNESS: Meaning RNSEC had millions of
[17] dollars in it.
[18] BY MR. ROBBINS:
[19] Q: Well, let me ask you this: You indicated that you
[20] had had conversations with Mr. Barbour in the last several
[21] months of 1994 about getting the NPF loan repaid; correct?
[22] A: About the fact that there was an outstanding
[23] balance owed to us by the NPF, yes.
[24] Q: Why was that of interest to you?
[25] A: Because it was a considerable amount of money. We

Page 117

[1] were moving up on an election cycle. It's fairly
[2] straightforward, I think.
[3] Q: But if you had a surplus, why did it matter to
[4] you, a surplus in the RNSEC account?
[5] A: Because I wanted to have every dollar available to
[6] me so I could make decisions and recommendations on how we
[7] were going to win more elections.
[8] Q: Because if the National Policy Forum did pay that
[9] loan back, to the extent it paid it back, that money would
[10] be useful in the campaign; correct?
[11] A: Sure.
[12] MR. ROBBINS: Why don't we take a break?
[13] [Recess.]
[14] MR. WEINSTEIN: Are we done with this document?
[15] MR. ROBBINS: Yes.
[16] MR. WEINSTEIN: Now, this is yours?
[17] MR. ROBBINS: Right.
[18] MR. WEINSTEIN: Do we get a copy?
[19] MR. ROBBINS: I think you don't.
[20] MR. WEINSTEIN: Okay. Well, I've got the Bates
[21] number. That's all right. That's fine.
[22] [Reed Deposition Exhibit No. 2
[23] marked for identification.]
[24] BY MR. ROBBINS:
[25] Q: Let me show you what's been marked as Reed 2,

Page 118

[1] which is a letter dated September 17, 1996, from the
[2] stationery of the law offices of Richard Richards.
[3] MR. WEINSTEIN: I want to note for the record that
[4] this document contains a Bates number of RB 014591,
[5] indicating that it was produced to the House of
[6] Representatives, and I'm not saying I'm not going to let the
[7] witness answer questions about it, but I do want to make
[8] note that, to the best of my knowledge, this document was
[9] not produced to this committee. Can you confirm or deny
[10] that, sir?
[11] MR. ROBBINS: I wouldn't be inclined to confirm or
[12] deny it, but in any event, I have no idea. So--
[13] MR. SHAW: I just have a simple question. Where
[14] did this document come from?
[15] MR. ROBBINS: I don't know.
[16] MR. SHAW: But it has--it's clearly labeled with a
[17] Bates number?
[18] MR. ROBBINS: Yes.
[19] MR. SHAW: Was it discovered in the normal course
[20] of discovery from the RNC to this committee?
[21] MR. ROBBINS: I don't know if it's produced by the
[22] RNC. But my understanding is it's been produced entirely in
[23] the course of standard--
[24] MR. WEINSTEIN: Well, my only question is this:
[25] Do you all--have you all been obtaining documents to use in

Page 119

[1] this deposition from the House of Representatives?
[2] MR. ROBBINS: I don't know the answer to that
[3] question, but in any event:
[4] BY MR. ROBBINS:
[5] Q: I've placed the document before you. Do you
[6] recognize the document?
[7] MR. WEINSTEIN: Well, no, no, because this is
[8] important. I mean, if we have here--I mean, this is
[9] certainly something that ought to be put on the record. If
[10] we have here the House of Representatives Committee on
[11] Governmental Affairs providing documents to the Senate
[12] Committee on Governmental Affairs, I mean, I think that's
[13] something we ought to know.
[14] MR. ROBBINS: I have no idea. I'm not aware of
[15] where the document came from. But I've placed the document--
[16] MR. WEINSTEIN: Is there anybody on the staff of
[17] the minority who could help us with that?
[18] MR. ROBBINS: Well, I'm not inclined to make that
[19] person available. I guess my--if there is such a person, I
[20] really don't know. But for the moment, I've got a document.
[21] MR. WEINSTEIN: Well, as long as we are in
[22] agreement that the document contains a Bates number of RB
[23] 014591 and the other several boxes of documents or the boxes
[24] of documents that we gave to you all, I think do not contain
[25] the prefix RB.

Page 120

[1] MR. ROBBINS: I'll tell you what. I am absolutely
[2] willing to stipulate that the document that I just showed
[3] you has RB 014591, 92, and 93.
[4] MR. WEINSTEIN: Well, then I will just simply go
[5] on the record and state, while I am certain that Mr. Robbins
[6] does not know and do not believe for any reason that you,
[7] sir, have purloined this or that it has been obtained by you
[8] in any improper way, that it does appear that the minority
[9] staff of the Senate Committee on Governmental Affairs has
[10] obtained or has come into your possession documents which
[11] were, in fact, produced to the United States House of
[12] Representatives.
[13] MR. ROBBINS: Where does it say that on this
[14] document?
[15] MR. WEINSTEIN: Well, this RB--
[16] MR. ROBBINS: Stands for what?
[17] MR. WEINSTEIN: Burton.
[18] MR. ROBBINS: Okay. If you say so.
[19] MR. WEINSTEIN: Now, it may be the case that if
[20] you check all your other boxes of documents, you will find
[21] that they do not have the prefix RB.
[22] MR. ROBBINS: Literally, you can put anything on
[23] the record that you want. So keep going, and then just say
[24] whatever you want to say, and then I just want an answer to
[25] the question.

Page 121

(1) MR. WEINSTEIN: But my concern is, unless I have
(2) it wrong-and I may very well have it wrong-that you all
(3) are not entitled to utilize documents that you obtained from
(4) other sources. I mean, let me put it a little bit more
(5) clearly: that it would be improper for you to utilize-let
(6) me ask the question this way-

(7) MR. ROBBINS: No, I'm not going to-

(8) MR. WEINSTEIN: Is it proper for you to utilize
(9) documents that have been produced to the House of
(10) Representatives in your investigation?

(11) MR. ROBBINS: I'm not answering the question
(12) because I'm not here to answer questions, as you pointed
(13) out.

(14) BY MR. ROBBINS:

(15) Q: Are you going to answer the question or not?

(16) MR. WEINSTEIN: Hold on one second. He may very
(17) well answer the question, but I am really concerned about
(18) this.

(19) MR. ROBBINS: I gather that. So just put on the
(20) record whatever concerns you have, and then let's get going.

(21) MR. WEINSTEIN: Well, my concern is threefold. I
(22) will proffer for the record that RB is indicative of the
(23) prefix that the Republican National Committee used in
(24) providing the documents to the House of Representatives. My
(25) understanding is that there are certain rules of discovery

Page 122

(1) that involve the Senate Committee on Governmental Affairs.
(2) And my view is that you, sir, are using a document that was
(3) not produced to your committee, that it was, in fact,
(4) produced to another committee. And I understand that there
(5) are confidentiality rules and regulations which apply to
(6) productions to the House of Representatives. And it is my
(7) opinion, sir, that you are improperly using a document that
(8) was not provided to your committee. And I have put that on
(9) the record, and we agree on the Bates number, and now you
(10) may-if you would like to make use of this improperly
(11) obtained document, you may ask the witness any question you
(12) would like.

(13) MR. ROBBINS: I can't agree with, I think, any of
(14) your premises, but I will.

(15) MR. WEINSTEIN: Well, you can agree that the
(16) document here is RB 014591 and that all of the tens of
(17) thousands of documents produced to your committee do not,
(18) unless there is some clerical error, contain the RB prefix.

(19) MR. ROBBINS: I tell you, I will agree with so
(20) much of your speech as it relates to the letters and the
(21) numbers. I absolutely agree that those letters and those
(22) numbers appear there. You've got my agreement on that?

(23) BY MR. ROBBINS:

(24) Q: Could you answer the question, please?

(25) A: What's the question?

Page 123

(1) Q: Can you identify the document?

(2) A: I've never seen this document before.

(3) Q: All right. Well, take a look at Exhibit 2. Do
(4) you know-

(5) MR. WEINSTEIN: On page 2?

(6) MR. ROBBINS: Exhibit 2, because that's the 2 that
(7) appears there. I got so good at working on that from the
(8) colloquy that we had before.

(9) BY MR. ROBBINS:

(10) Q: Exhibit 2 says in its third and fourth paragraph,
(11) "Just prior to the elections of 1994, I was asked by Fred
(12) Volcansek to help facilitate a loan in excess of \$2 million
(13) to assist you in replacing hard money at the Forum with soft
(14) money so that the hard dollars could be used to help pick up
(15) 60 targeted House seats. As a result of Fred's request, I
(16) contacted Mr. Ambrous Young and asked him if he was
(17) interested in that kind of assistance for the party. You
(18) and I then had several discussions concerning a loan
(19) guarantee by Mr. Young."

(20) My question to you is: Do you have any knowledge
(21) at all of the facts identified-or the facts asserted in
(22) those two paragraphs?

(23) MR. WEINSTEIN: We're making clear that you are
(24) not saying that Mr. Reed is referenced in this letter. He
(25) says he hasn't seen the letter. You're asking him whether

Page 124

(1) he knows about any of these facts?

(2) MR. ROBBINS: Was there some word in the question
(3) that I asked which was obscure in any way?

(4) MR. WEINSTEIN: I don't know.

(5) MR. ROBBINS: I didn't think so, either.

(6) BY MR. ROBBINS:

(7) Q: Could you answer my question, please?

(8) A: I read in the papers a couple of weeks ago about
(9) this letter. That's the first time I knew anything about
(10) it.

(11) Q: Okay. So do you know Fred Volcansek?

(12) A: No.

(13) Q: Have you ever met him?

(14) A: No.

(15) Q: Did Mr. Barbour ever speak to you about any
(16) efforts he was making to obtain money that would repay a
(17) loan by the RNC to the National Policy Forum?

(18) MR. WEINSTEIN: You've already asked him this
(19) question. This is what I don't really think is fair, is
(20) that you've asked him-I know the record reflects you've
(21) already asked him this question, and he testified as some
(22) length about it. And now you're basically asking him the
(23) same question again.

(24) MR. ROBBINS: All set?

(25) MR. WEINSTEIN: Am I all set?

Page 125

(1) MR. ROBBINS: Yeah.

(2) MR. WEINSTEIN: I don't know what that means.

(3) What I'm saying is you asked him the same question. I'm
(4) objecting, asked and answered. I will allow the witness to
(5) answer, but I-

(6) MR. ROBBINS: That's great.

(7) MR. WEINSTEIN: I am not-I am not altogether
(8) comfortable with this.

(9) MR. ROBBINS: I don't want you to be
(10) uncomfortable. I just want an answer to my question.

(11) THE WITNESS: And the answer-the question is?

(12) BY MR. ROBBINS:

(13) Q: Do you have any-did you have any communication
(14) with Mr. Barbour about efforts he was making to help-
(15) specific efforts he was making to help get the NPF to repay
(16) the loan to the National Policy-strike that-to get the
(17) National Policy Forum to repay the loan to the RNC?

(18) A: Mr. Barbour notified me-the chairman-that there
(19) would be some money coming back from the NPF to the RNC,
(20) yes.

(21) Q: Okay. When did he do so?

(22) A: I don't remember. Sometime in the fall.

(23) Q: Of 1994?

(24) A: Of '94.

(25) Q: And did he indicate to you approximately how much

Page 126

(1) money was coming back?

(2) A: I believe he indicated somebody was going to be
(3) making a contribution or a loan to the NPF of over \$1
(4) million, and then that some of that would be coming back.

(5) Q: Coming back?

(6) A: To the RNC to repay the loan.

(7) MR. WEINSTEIN: Could we have a break for just one
(8) second? We will be very brief here.

(9) MR. ROBBINS: Could I finish my questioning?

(10) MR. WEINSTEIN: Is the line of questioning dealing
(11) with this document-

(12) MR. ROBBINS: It's dealing with not the document
(13) but the conversation that he just outlined that he
(14) remembers. I'm not asking about the document at all, sir.

(15) MR. WEINSTEIN: Okay.

(16) BY MR. ROBBINS:

(17) Q: And what do you remember-do you remember him
(18) identifying the person who was going to be providing the
(19) money?

(20) A: I don't remember him identifying the person. I've
(21) now learned to understand from news reports that it was Mr.
(22) Young. I don't remember a specific conversation where he
(23) mentioned Mr. Young.

(24) Q: Do you remember a general description of how he
(25) was going to arrange the money?

Page 127

(1) A: No.
(2) Q: Did he say to you what he had done in order to
(3) obtain that money?
(4) A: No.
(5) Q: You remember it as he simply notified you that the
(6) money was going to be coming in?
(7) A: I remember being notified that somebody was going
(8) to be making a contribution to or a loan to the NPF and
(9) that some of the money owed to the RNC would be repaid. I
(10) don't remember when, how. It was during an election time.
(11) It was a very busy time.
(12) MR. WEINSTEIN: You can continue.
(13) THE WITNESS: He was on the road a lot. It was
(14) over-probably over the telephone, but I don't remember.
(15) BY MR. ROBBINS:
(16) Q: But it was Mr. Barbour who told you this?
(17) A: Yeah.
(18) Q: And it was in the fall of 1994?
(19) A: Sometime in August, September, or October of '94.
(20) Q: When the congressional campaign was really heating
(21) up; correct?
(22) A: Well, after Labor Day is the traditional starting
(23) date, yeah.
(24) Q: And is it your testimony that you don't recall-
(25) well, let me ask you: Were you relating to him or keeping

Page 128

(1) him apprised of the need for-the needs that the GOP had for
(2) certain kinds of money during this period of time?
(3) A: I-
(4) MR. WEINSTEIN: I'm going to object. I'm going to
(5) object. I believe that this witness testified to you that
(6) he spoke to Mr. Barbour every day about money at this time.
(7) BY MR. ROBBINS:
(8) Q: Do you want to answer the question, please?
(9) A: As I mentioned to you earlier, we spoke every day
(10) about priority races, who was up, who was down, and where we
(11) ought to be making contributions.
(12) Q: Okay. So part of your job was to monitor the
(13) needs of the national party for money in different parts of
(14) the country; correct?
(15) A: Correct.
(16) Q: And to do what things were necessary or could be
(17) done to make sure that money was allocated appropriately?
(18) A: Correct.
(19) Q: And was available?
(20) A: Correct.
(21) Q: And you would speak to the chairman of the
(22) Republican National Committee more or less daily about this;
(23) correct?
(24) A: Correct.
(25) Q: And it was in one of the conversations that you

Page 129

(1) were having with the chairman daily, if not several times a
(2) day, that he indicated to you that more than \$1 million was
(3) coming back in?
(4) A: He indicated to me that somebody would be making a
(5) loan or a grant to the NPF and that some money would be
(6) coming back in. I don't remember how I got notified on how
(7) much it was.
(8) Q: Did you ever have any communication with anybody
(9) other than Mr. Barbour about that?
(10) MR. WEINSTEIN: About what?
(11) MR. ROBBINS: What he just talked about.
(12) THE WITNESS: I probably had a communication with
(13) Don Fierce about it.
(14) BY MR. ROBBINS:
(15) Q: What's your memory of the conversation with Don
(16) Fierce?
(17) A: Just the same thing. Somebody was going to be
(18) making a contribution or a loan. That was it.
(19) Q: And who was Don Fierce?
(20) A: Don Fierce was the director of congressional
(21) relations for us.
(22) Q: Why did you have a conversation with the director
(23) of congressional relations about this?
(24) A: Because his office was right next to mine.
(25) Q: Do you recall the conversation?

Page 130

(1) A: No, I don't recall the conversation. I answered
(2) your question.
(3) Q: What was his job? I understand the title, but
(4) what were his responsibilities?
(5) A: He was the liaison to the House and the Senate
(6) offices.
(7) Q: And why would the issue of a loan to the NPF that
(8) would be used to repay money owed to the Republican National
(9) Committee be of interest to the liaison with the Republican
(10) Members of Congress?
(11) MR. WEINSTEIN: You assume a supposition not
(12) necessarily in evidence, and that is that it was of interest
(13) to Mr. Fierce. He said his office was right next door and
(14) he talked to him about it. He didn't say it was of interest
(15) to him.
(16) BY MR. ROBBINS:
(17) Q: Was it?
(18) A: Yes.
(19) Q: Of interest to him?
(20) A: It was-he knew about it probably through Haley.
(21) He mentioned it to him.
(22) Q: He mentioned it to you?
(23) A: In addition to Haley, that's correct.
(24) Q: So you have a memory that Mr. Fierce did, in fact,
(25) mention to you that a grant or a loan, as you say, was going

Page 131

(1) to be coming in to the National Policy Forum, which was
(2) going to be then used to provide money back to the
(3) Republican National Committee?
(4) A: No, I didn't say that. I said that he told me
(5) that there was going to be a grant or a loan going to the
(6) National Policy Forum, period.
(7) Q: Now, did he-
(8) A: Mr. Fierce had no role with what was coming back
(9) to the RNC or what was going out from me from the RNC.
(10) Q: Okay.
(11) A: There's a distinction there.
(12) Q: Okay. Other than this conversation with Mr.
(13) Fierce and the conversation with the chairman of the
(14) Republican National Committee, Mr. Barbour, did you ever
(15) have any communication with anybody else about the
(16) contribution or the grant or the loan that was coming to the
(17) NPF which we now know went back to the Republican National
(18) Committee?
(19) MR. WEINSTEIN: What time-
(20) THE WITNESS: Not to my recollection.
(21) MR. ROBBINS: At any time period, other than your
(22) counsel.
(23) THE WITNESS: Not to my recollection.
(24) BY MR. ROBBINS:
(25) Q: Did you ever inquire what the source of the money

Page 132

(1) was?
(2) A: I probably inquired about the source and was told
(3) it was somebody named Mr. Young, but I didn't inquire beyond
(4) that because I had faith that the lawyers would have been
(5) involved and it would have all been done legally.
(6) Q: Well, did you as the executive director of the
(7) Republican National Committee instruct that any particular
(8) steps be taken to ensure that contributions to the National
(9) Policy Forum were legal?
(10) A: No. It wasn't my role or responsibility.
(11) Q: Did you take any steps to ensure that
(12) contributions to the RNC were legal?
(13) A: Yes. We had a process in place.
(14) Q: What was the process?
(15) A: Contributors that gave money filled out cards that
(16) mentioned where they lived, where they worked, their
(17) address. That is the legal need for contributions, and we
(18) were pretty aggressive about it. If people just turned in
(19) checks, we would write them back a letter asking them to
(20) fill out the rest of the paperwork and submit it.
(21) Q: As a matter of procedure-and, again, obviously,
(22) only while you were the executive director of the Republican
(23) Party-other than requiring contributors to fill out cards
(24) stating their personal information, was there any other
(25) screening procedure for contributions?

Page 133

(1) A: Not to my knowledge, but I believe there may have
(2) been an informal process that if something came in, it would
(3) go up to the Legal Office to be reviewed. But I don't
(4) remember.

(5) Q: If what came in?

(6) A: If a contribution came in that was for some reason
(7) questioned, it would go up to the legal beagles.

(8) Q: Okay. That's your understanding?

(9) A: Yes.

(10) Q: Did that ever occur while you were there, to your
(11) knowledge?

(12) A: I can't remember. I don't remember.

(13) Q: Were there any criteria in place for determining
(14) when a contribution should be regarded as questionable and,
(15) therefore, sent up to the legal beagles?

(16) A: Well, as I said, it was an informal thing.

(17) Q: It was an ad hoc thing, correct?

(18) A: I believe, but I don't remember it specifically
(19) being used.

(20) Q: But the only procedure that you remember being in
(21) place for screening contributions to the RNC was the
(22) requirement that donors fill out a card identifying where
(23) they lived, whether they were a citizen of the United States
(24) and so forth?

(25) A: Their occupation.

Page 134

(1) Q: And their occupation. Were they asked whether
(2) they were a citizen of the United States?

(3) A: I don't remember.

(4) Q: Are the cards--

(5) A: That doesn't mean there weren't other processes in
(6) place down in Finance. I just may not have been aware of
(7) it.

(8) Q: Well, you as the--you were the chief operating
(9) officer of the RNC for two years, right?

(10) A: Yes, I know that.

(11) Q: Are you, as that, as the person who served that
(12) function, are you aware of any other screening procedures
(13) for donation to the RNC while you were at the RNC?

(14) A: No.

(15) Q: Did you ever--were you aware that Mr. Barbour--
(16) strike that. Were you aware of any foreign trips that Mr.
(17) Barbour took during '93, '94, or '95?

(18) A: Well, I left in February of '95, so I was pretty
(19) busy after that. Sometime in--I believe it was '94, I think
(20) he took a trip through the IDU, which was the International
(21) Democratic Union, which I believe he was the vice chairman
(22) of.

(23) Q: A trip to where?

(24) A: I don't remember.

(25) Q: I was like frantically trying to think if that was

Page 135

(1) like a new name for a bunch of formerly Soviet republics,
(2) the IDU, because he took a trip to the IDU, I'm thinking--

(3) A: Through it. It's an organization, but I don't
(4) remember where they were.

(5) Q: Did he ever take a trip to Asia when you were at
(6) the RNC?

(7) A: I do not believe so.

(8) Q: Did he have communications with anybody in Hong
(9) Kong?

(10) A: Not that I'm aware of.

(11) Q: Did you ever learn that any official or employee
(12) of the National Policy Forum was in touch with anybody in
(13) Hong Kong?

(14) A: During the time when I was at the Republican
(15) National Committee, no.

(16) Q: Did you ever have any communication with Richard
(17) Richards about the National Policy Forum?

(18) A: No. Not to my recollection.

(19) Q: Did you ever have any communication with Richard
(20) Richards about the Young or Young Brothers?

(21) A: No, not to my recollection. I don't believe I've
(22) ever met Richard Richards.

(23) MR. ROBBINS: Let me have the next document

(24) marked, which would be Exhibit 3.

(25) [Reed Deposition Exhibit No. 3]

Page 136

(1) marked for identification.]

(2) MR. ROBBINS: There's a blue line to the left of
(3) the first paragraph on Exhibit 3, which was not part of the
(4) original exhibit.

(5) [Witness perusing document.]

(6) MR. SHAW: Mr. Robbins, if I could just point out
(7) that this document has the Bates number R 021495 to 021497,
(8) which is different than the previous exhibit Bates prefix of
(9) RB.

(10) MR. ROBBINS: That's helpful, but we probably
(11) could have gathered that from the comparison, but it's
(12) always--

(13) MR. WEINSTEIN: I think it's always useful to
(14) point out where documents are properly and improperly
(15) utilized.

(16) MR. ROBBINS: Oh, now, now, now. I somehow--

(17) MR. SHAW: I was just making a clarification.

(18) MR. ROBBINS: --feel disinclined to accept
(19) automatically the assertions that you're making, but be that
(20) as it may.

BY MR. ROBBINS:

(22) Q: You've never seen this document before?

(23) A: No.

(24) Q: There was a monthly television show, "Listening to
(25) America," while you were at the RNC?

Page 137

(1) A: This memo says it was the National Policy Forum's.

(2) Q: I'm sorry. While you were at the RNC, was there a
(3) television show--

(4) A: Yes.

(5) Q: --"Listening to America"?

(6) A: Yes, there was.

(7) Q: And did you--was it your view at the time you were
(8) at the RNC that it had the potential to be an effective part
(9) of Republican victories in '94?

(10) A: Yes. Yes, that's fair to say.

(11) Q: And why is that?

(12) A: Because it was part of our ongoing interest in
(13) promoting Republican policies and ideas.

(14) Q: Did you have any role in setting up the TV show?

(15) A: Yes.

(16) Q: What was your role?

(17) A: I supervised the team that managed designing the
(18) studio and building the studio and getting the first few
(19) shows off the ground.

(20) Q: And these are--

(21) A: RNC employees.

(22) Q: These were RNC employees. And you supervised
(23) them?

(24) A: Yes.

(25) Q: In putting together the television show.

Page 138

(1) "Listening to America"?

(2) A: Correct.

(3) Q: Which was put out by National Policy Forum?

(4) A: No. It was put out by the RNC.

(5) Q: When Ms. Westner--strike that. When Ashley Barron
(6) says in Exhibit 3 "National Policy Forum's monthly
(7) television show, "Listening to America"--I may be wrong--is
(8) she incorrect that it was a National Policy Forum show?

(9) A: I believe so.

(10) MR. WEINSTEIN: Let--go ahead.

(11) MR. ROBBINS: Mr. Weinstein, you seem disturbed.
(12) If you're not, I don't want to cause you to be disturbed.

(13) MR. WEINSTEIN: No. I would like to take a minute
(14) and speak with the witness, if possible, because this
(15) happened after his--after his time period.

(16) MR. ROBBINS: Well, I was going to get to that
(17) because I thought that might be--

(18) MR. WEINSTEIN: I mean, that's useful because he
(19) was long gone by then, and I don't want things to get
(20) confused.

(21) MR. ROBBINS: Sure. Let me see if I can make it
(22) clear.

BY MR. ROBBINS:

(24) Q: "Listening to America" was a TV show that was
(25) instituted while you were the executive director of the RNC.

Page 139

[1] correct?
[2] A: There was a TV show instituted while I was the
[3] executive director of the RNC. I believe it was called
[4] "Listening to America."
[5] MR. WEINSTEIN: See, that's the confusing point,
[6] the GOP-TV versus "Listening to America" gets--
[7] MR. ROBBINS: Let me see if I can ask the
[8] questions and see if I can clarify that so there is no
[9] confusion. I don't aim to confuse you at all.
[10] BY MR. ROBBINS:
[11] Q: And your role was to supervise other RNC employees
[12] in putting this together?
[13] A: Putting together GOP-TV, is what it was called.
[14] That's correct.
[15] Q: And one of the shows that GOP-TV put out was
[16] "Listening to America"?
[17] A: I don't--
[18] MR. WEINSTEIN: Well, but that's a different
[19] thing.
[20] MR. ROBBINS: Can I just--
[21] MR. WEINSTEIN: No, no, but you're confusing him.
[22] The studio may have been used and rented out to somebody--
[23] MR. ROBBINS: Mr. Weinstein--
[24] MR. WEINSTEIN:--and they may have used it for a
[25] television show.

Page 140

[1] MR. ROBBINS: Mr. Weinstein, I'm just asking
[2] questions. You're not the witness. Do you understand? I'm
[3] sure you understand the essential difference in our roles
[4] here. I'm not going to try to trick him, but I've got to
[5] ask questions, and you don't testify.
[6] MR. WEINSTEIN: You're showing him a document that
[7] was six months after he left from somebody who I don't know
[8] if he knows or doesn't know. To state--
[9] MR. ROBBINS: Who cares if he knows or doesn't
[10] know. I'm asking--forget about this memo. Turn it over.
[11] MR. WEINSTEIN: Okay. That's good. Let's turn it
[12] over.
[13] MR. ROBBINS: And let me ask questions of the
[14] witness.
[15] MR. WEINSTEIN: Very well.
[16] BY MR. ROBBINS:
[17] Q: When you were executive director of the RNC, did
[18] you play a role in setting up a TV show called "Listening to
[19] America"?
[20] A: No.
[21] Q: Did you play any role in it at all?
[22] A: I don't know there was a TV show called "Listening
[23] to America."
[24] Q: Did you say a few months ago that you did play a
[25] role in--

Page 141

[1] MR. WEINSTEIN: What he said was that it was
[2] GOP-TV.
[3] THE WITNESS: What I said before was that we put
[4] together a studio and set up a television show called GOP-
[5] TV. Whatever happened after I left with the title or
[6] changes or with NPF, I didn't do--I don't have any clue.
[7] BY MR. ROBBINS:
[8] Q: Okay. So let me see if I understand this. What
[9] you set up in '93, '94 was GOP-TV, right?
[10] A: Which was by the Republican National Committee.
[11] Q: And paid for directly by the Republican National
[12] Committee?
[13] A: Correct.
[14] Q: With the use of Republican National Committee
[15] staff?
[16] A: Correct.
[17] Q: At any time while you were at the Republican
[18] National Committee, was this facility used for NPF
[19] productions?
[20] A: Not to my recollection.
[21] Q: Do you have any knowledge whether or not it
[22] subsequently was used by NPF?
[23] A: I have no knowledge.
[24] Q: Have you ever heard that it was?
[25] A: When you just showed me this memo right here for

Page 142

[1] the first time.
[2] Q: There was, however, a "Listening to America"
[3] series of forums and publications while you were at the
[4] Republican National Committee; correct?
[5] A: The theme of the road meetings was called
[6] "Listening to America," that's correct. And then there was
[7] a booklet published--I don't remember if it was while I was
[8] still there or after I had left--called "Listening to
[9] America" by the National Policy Forum.
[10] Q: And both the "Listening to America" forums and
[11] "Listening to America" publications, while you were at the
[12] RNC were National Policy Forum productions?
[13] A: Products, that's correct.
[14] Q: Do you know who Ashley Barron is?
[15] A: No.
[16] Q: Do you know who Fran Westner is?
[17] A: No.
[18] Q: To your knowledge, was this studio--I may have
[19] asked this question before; I forget--that you helped set up
[20] and supervise the setting up of used in any way for the
[21] National Policy Forum?
[22] A: Not to my knowledge.
[23] Q: When you were there?
[24] A: Not to my knowledge.
[25] MR. WEINSTEIN: There is a difference when you say

Page 143

[1] "used," I believe, and the witness can answer this because
[2] this is just my belief, that the studio may have been rented
[3] out, commercially rented out to other organizations. I
[4] don't know if NPF was one of them or not. But when you say
[5] was the studio used for NPF, this may help in terms of
[6] actually getting at what you are--
[7] MR. ROBBINS: That is very helpful to me, in fact.
[8] BY MR. ROBBINS:
[9] Q: To your knowledge, was this facility utilized in
[10] any way at all by the National Policy Forum while you were
[11] there?
[12] A: No, with the exception--I believe Baroody appeared
[13] once on a show. But I'd have to check the facts on that.
[14] Q: Who at the RNC when you were there was most
[15] knowledgeable about GOP-TV?
[16] A: The director of communications, Chuck Greener.
[17] Q: And where is Chuck Greener now?
[18] A: He's here in town, in a public relations firm. A
[19] woman, Patrice Garrity, that ran it, was the producer-
[20] director, and the chairman.
[21] Q: Did Mr. Barbour ask you or direct you to set up
[22] GOP-TV?
[23] A: It was one of the things we talked about when we
[24] ran for office, and it was one of the things I did in '93,
[25] yes.

Page 144

[1] Q: Did you ever have any communication with him about
[2] making the facility available for National Policy Forum?
[3] A: Not that I remember.
[4] Q: Did you ever have a communication with him about
[5] refraining from making it available for National Policy
[6] Forum?
[7] A: Not that I remember. It wasn't--there was no
[8] parallel there.
[9] Q: No what?
[10] A: NPF's mission was to have town meetings, and the
[11] studio wouldn't have any--there wouldn't be any connect,
[12] connection.
[13] Q: But you can't recall any conversation where
[14] someone said, in effect, let us make certain that the
[15] National Policy Forum does not utilize this facility?
[16] A: I don't remember it ever coming up regarding the
[17] facility, positive or negative.
[18] Q: Let me show you a document which is Bates stamped
[19] RB 015329 through 015332, and let's have it marked as an
[20] exhibit.
[21] [Reed Deposition Exhibit No. 4
[22] marked for identification.]
[23] MR. WEINSTEIN: Let the record reflect that this
[24] document was not produced to the committee, the Senate
[25] committee, and that it was produced to the House of

Page 145

(1) Representatives, and that it was obtained for use by Mr.
(2) Robbins and his colleagues through some channel which, to
(3) the best of my knowledge, was not the channel that came from
(4) the Republican National Committee.

(5) MR. ROBBINS: Well, I don't know what you're
(6) talking about, but I would note that the third page of this
(7) document, sir, is signed by Scott Reed on behalf of the
(8) Republican National Committee. Now, if there is some
(9) reason--

(10) THE WITNESS: The first page?

(11) MR. ROBBINS: Yes.

(12) THE WITNESS: That's not my signature.

(13) BY MR. ROBBINS:

(14) Q: Signed on your behalf by Michael Hess.

(15) A: Yeah, and there's a big difference.

(16) Q: And Michael Hess was who, sir?

(17) A: The general counsel.

(18) Q: Of what?

(19) A: The Republican National Committee.

(20) Q: And he was authorized to sign on behalf of the

(21) Republican National Committee?

(22) A: It appears so.

(23) Q: Did you know that he was signing on behalf of the

(24) Republican National Committee?

(25) A: I must have.

Page 146

(1) Q: Now, the next page--

(2) MR. WEINSTEIN: Which page is this, sir?

(3) MR. ROBBINS: The fourth page of this document.

(4) MR. WEINSTEIN: The one that is marked RB 015332?

(5) MR. ROBBINS: That's right.

(6) BY MR. ROBBINS:

(7) Q: Do you see anybody's signature that looks familiar
(8) there?

(9) A: Yes.

(10) Q: Whose is that?

(11) A: Baroody's.

(12) Q: Who else's?

(13) A: Mine.

(14) Q: On behalf of?

(15) A: The Republican National Committee.

(16) Q: Now, would this be the kind of document which

(17) would be kept in the possession or the records of the

(18) Republican National Committee?

(19) A: Probably, because it's a loan document.

(20) Q: Has this document been produced by you?

(21) MR. WEINSTEIN: We're not going to talk about that
(22) now at all.

(23) MR. ROBBINS: Oh, okay.

(24) BY MR. ROBBINS:

(25) Q: Well, I'm going to ask you some questions about

Page 147

(1) it, nevertheless.

(2) A: Fire away.

(3) Q: This is a document that you signed on behalf of
(4) the Republican National Committee constituting an addendum
(5) to a loan agreement between the Republican National
(6) Committee and the National Policy Forum; right?

(7) A: This is a document, as I described earlier in the
(8) day, which was the formal paperwork for the money to be
(9) loaned to the NPF Part of the process we discussed
(10) earlier.

(11) Q: Have you read this document? Just now, did you
(12) look through the document?

(13) [Witness perusing document.]

(14) THE WITNESS: I've read it.

(15) BY MR. ROBBINS:

(16) Q: Did you discuss this with Haley Barbour before you
(17) signed it?

(18) MR. WEINSTEIN: This specific document.

(19) MR. ROBBINS: Yeah.

(20) THE WITNESS: I don't remember discussing this
(21) specific document with the chairman before I signed it. But
(22) as I mentioned earlier, I would bounce these things off him
(23) prior to doing it, if I could reach him.

(24) BY MR. ROBBINS:

(25) Q: Do you recall Mr. Baroody indicating anything to

Page 148

(1) you about the need for the additional monies reflected in
(2) this--these documents?

(3) A: Not in regards to these specific documents, but as
(4) I mentioned earlier, he would notify me when they were in
(5) need of funds to make payroll or whatever else they needed.

(6) Q: Did the RNC in 1993-94 make loans to entities
(7) other than the National Policy Forum?

(8) A: Not to my recollection.

(9) Q: So when we said before that--or when you said
(10) before that the National Policy Forum was the RNC's largest
(11) debtor--

(12) A: Right.

(13) Q: --you were being quite precise; it was also its
(14) only debtor. Correct?

(15) A: I believe so. We may have lent money to one state
(16) party, and I don't remember which one, because of a problem.
(17) We tried to not be in the business of doing that, so I don't
(18) want to say definitely there wasn't any other loan.

(19) Q: You have no recollection of any loan that the RNC
(20) ever provided to anybody while you were its executive
(21) director other than the National Policy Forum?

(22) A: With the possible exception of one state party,
(23) which I don't remember which one it was.

(24) Q: One state Republican Party?

(25) A: Yeah.

Page 149

(1) Q: But you're not certain--

(2) A: I'm not certain but I--

(3) Q: --about that?

(4) A: As I'm sitting here, I think we may have bailed
(5) somebody out on something.

(6) Q: By bailing them out, you mean the state Republican
(7) Party?

(8) A: Yeah, state party.

(9) Q: Were you paid back?

(10) A: I don't remember if we ever did.

(11) Q: Okay. So--

(12) A: If we did, I would have hoped to have been paid
(13) back, yes.

(14) Q: So the record is clear, the only entity that you
(15) know the RNC lent money to while you were its executive
(16) director was the National Policy Forum?

(17) A: That's correct.

(18) MR. ROBBINS: Let us mark the next document.

(19) [Reed Deposition Exhibit No. 5

(20) marked for identification.]

(21) [Witness perusing document.]

(22) MR. ROBBINS: It's a--

(23) MR. SHAW: Mr. Robbins, does this have a Bates
(24) number on it?

(25) MR. ROBBINS: It doesn't. It's a 10-page

Page 150

(1) document--well, you know that it doesn't because this
(2) doesn't have it.

(3) MR. SHAW: I just wanted--I mean, maybe it's
(4) buried later on in the document. I was just wondering if
(5) it--

(6) MR. ROBBINS: No, I don't see one. It's a 10-page
(7) document dated June 2, 1993, from Scott Reed to Haley
(8) Barbour, Mike Baroody, and Ken Hill.

(9) MR. WEINSTEIN: Does this presuppose--and you may
(10) ask the witness this. I do not know.

(11) MR. ROBBINS: Does what presuppose?

(12) MR. WEINSTEIN: Does this presuppose that these
(13) two pages, which looks like they go together--they don't
(14) look like they should be attached to these other two pages.

(15) MR. ROBBINS: That's a perfectly fair point. I
(16) don't know.

(17) MR. WEINSTEIN: Well, one document is dated June
(18) 2, 1993, and the other bears a facsimile notation of October
(19) 1, 1993, which would lead one to believe that they should
(20) not be all stapled together.

(21) MR. ROBBINS: I agree with you.

(22) MR. WEINSTEIN: Now, I do not really have a clue
(23) as to all the rest of these, but I do want to make the point
(24) that--I guess it is fair to say that 1 and 2 belong
(25) together, but as for the rest of these, the staple is

Page 151

(1) merely--the staple that holds them together is merely--may
(2) be superfluous.
(3) MR. ROBBINS: I think you must be right about
(4) that. You're obviously correct about that.
(5) MR. SHAW: Mr. Robbins, just for a point of
(6) clarification. To your knowledge, is this the first time
(7) that the majority has been provided with this document since
(8) there is no Bates stamp number on it?
(9) MR. ROBBINS: I would be flabbergasted if this was
(10) the first time it's been provided to the majority. I would
(11) be personally surprised, but I don't know.
(12) MR. SHAW: Why?
(13) MR. ROBBINS: Well, because this has been
(14) discussed, I think, at meetings of the committee.
(15) THE WITNESS: The first two pages--
(16) MR. ROBBINS: The first two meetings--the first
(17) two pages, right.
(18) MR. WEINSTEIN: When we talk about this as one
(19) document, I do think we ought to talk about the document as
(20) consisting of these first two pages, and these other eight
(21) are pages from somewhere that have been stapled here for
(22) convenience.
(23) MR. ROBBINS: You're right. And I think you've
(24) made the record clear. You must be right that the original
(25) of this June 2, 1993, document did not have a fax dated

Page 152

BY MR. ROBBINS:

(1) October 1, 1993.
(2) Q: Let me direct your attention to the first two
(3) pages of Exhibit 5. Those are a memo, constitute a memo
(4) that you sent to Haley Barbour, Mike Baroody, and Ken Hill
(5) on June 2, 1993?
(6) A: That's what it looks like.
(7) Q: And Ken Hill's position was?
(8) A: I don't remember his exact title. He was over at
(9) the National Policy Forum. I think he was in the
(10) leadership.
(11) Q: And what was the purpose of this memorandum?
(12) A: Well, I believe the purpose of this memorandum was
(13) for an agenda for a meeting on some things that I thought
(14) the chairman would want to see addressed through his role as
(15) chairman of the National Policy Forum.
(16) Q: This, I take it, was prepared on the stationery
(17) or--let me put it this way, prepared within the RNC.
(18) A: Well, if it was written by me, it would have been
(19) prepared in the RNC.
(20) Q: Okay. And the purpose--is it fair to say the
(21) purpose was to identify things that you thought needed to be
(22) discussed or things needed to be done to further the NPF?
(23) A: It was a memo that I sent to the chairman to
(24) recommend to him some things that I thought, through his

Page 153

(1) role as the chairman of the NPF, he ought to see addressed.
(2) This was in the early days of, I believe, setting up the
(3) NPF. They're some of my thoughts on things that ought to
(4) get addressed in the short term.
(5) Q: So you as the executive director of the RNC sent
(6) it to Haley Barbour in his capacity as chairman of the NPF?
(7) A: And as chairman of the RNC.
(8) Q: Okay. You sent it to him--
(9) A: It's fair to say in my position I was one of his
(10) chief advisors, politically.
(11) Q: So that I understand this, you, to the extent that
(12) these distinctions have any meaning, sent it to Mr. Barbour
(13) both in his capacity as head of the RNC and in his capacity
(14) as head of the NPF?
(15) A: Correct.
(16) Q: Let's talk about fund-raising.
(17) A: Okay.
(18) Q: Where did your ideas for fund-raising come from?
(19) A: Well, having reviewed this recently, I believe
(20) what I was trying to accomplish there was recommend some
(21) basic steps on how to get the fund-raising mechanism moving,
(22) beginning with a basic list of people to approach, followed
(23) by the need to put together a basic business plan on what
(24) these folks would be asked to do, followed by what appears
(25) to be some names of some people that must have either

Page 154

(1) approached us or somebody had approached them about interest
(2) in--since the announcement that was made that the NPF was
(3) going to take shape, followed by my point made earlier to
(4) you that there needed to be some policy discussion and
(5) direction given to the NPF and the NPF staff on how to deal
(6) with foreign contributions, legal U.S. subsidiaries, and
(7) that I thought if they were going to--they would need to
(8) develop some type of a cash flow plan.
(9) Q: Mr. Reed, I want to go back because I'm a little
(10) bit puzzled. Isn't it the case that you thought that the
(11) NPF could take money from foreign corporations, whether or
(12) not they had American subsidiaries?
(13) A: No, that wasn't the case at all.
(14) Q: You thought they couldn't?
(15) A: I thought they could legally take money from who
(16) they could legally take money from, and if it included a
(17) foreign company with a U.S. subsidiary, which I have since
(18) learned is legal, they could do it.
(19) Q: Did you believe they could take money from foreign
(20) corporations whether or not--
(21) MR. WEINSTEIN: I'm going--
(22) BY MR. ROBBINS:
(23) Q: --they had an American subsidiary?
(24) MR. WEINSTEIN: I'm going to direct the witness
(25) not to answer that question. To be clear, I'll put it on

Page 155

(1) the record. I believe you have asked this question a number
(2) of different times. It is an effort to confuse the witness.
(3) It is an effort to cause the witness to make legal
(4) decisions. If you want to ask him what he meant by the word
(5) "foreign" in this memorandum--
(6) MR. ROBBINS: No, I'll ask the question, and you
(7) can give whatever instruction you want.
(8) MR. WEINSTEIN: I have given the instruction--
(9) MR. ROBBINS: Let me ask it and we'll have it on
(10) the record.
(11) MR. WEINSTEIN: Very well.
(12) BY MR. ROBBINS:
(13) Q: You say the word "foreign" here.
(14) A: Correct.
(15) Q: Were you referring only to--let me put it a
(16) different way: Did you believe at the time that you wrote
(17) this memo that the NPF could take money from foreign
(18) corporations, including those which did not have American
(19) subsidiaries?
(20) MR. WEINSTEIN: I will object to the question as
(21) being asked and answered, calling for a legal conclusion,
(22) and I will instruct the witness not to answer that question.
(23) BY MR. ROBBINS:
(24) Q: Did you have an understanding about whether or not
(25) there were any limitations on what foreign money could be

Page 156

(1) taken in by the NPF?
(2) MR. WEINSTEIN: I will instruct the witness not to
(3) answer because the witness has previously answered this
(4) question and it calls for a legal--
(5) MR. ROBBINS: You're going to instruct him not to
(6) answer on the basis that you think it's been asked and
(7) answered?
(8) MR. WEINSTEIN: I think that you are badgering the
(9) witness.
(10) MR. ROBBINS: All right. Let's do a list of
(11) questions so we can have a record to present to the
(12) committee.
(13) BY MR. ROBBINS:
(14) Q: Did you have a conversation with the chairman
(15) about whether or not the National Policy Forum could accept
(16) money from foreign sources, even those which did not have
(17) American subsidiaries?
(18) A: No, I don't remember having that conversation?
(19) Q: Did you have--was it your understanding that the
(20) NPF could accept money from foreign sources, even ones which
(21) did not have American corporations?
(22) MR. WEINSTEIN: I'm going to instruct the witness
(23) not to answer having previously answered the question. He
(24) has previously answered the question--
(25) MR. ROBBINS: What was his answer?

Page 157

[1] MR. WEINSTEIN: The record reflects it.
[2] MR. ROBBINS: Do you know what the answer is?
[3] MR. WEINSTEIN: Sir, the record will reflect what
[4] the answer is.
[5] MR. ROBBINS: Okay--
[6] MR. WEINSTEIN: But I do know he was asked it.
[7] BY MR. ROBBINS:
[8] Q: Did you have a communication with anybody about
[9] whether or not the National Policy Forum, Mr. Reed, could
[10] take money from foreign sources without limitation?
[11] MR. WEINSTEIN: Aside from the chairman?
[12] MR. ROBBINS: Anybody.
[13] THE WITNESS: I don't remember having that
[14] conversation, no.
[15] BY MR. ROBBINS:
[16] Q: Had anybody ever provided you with any information
[17] at the time that you wrote this memo, sir, suggesting that
[18] you could not take money from foreign sources--that the NPF,
[19] excuse me, could not take money from foreign sources?
[20] A: As I said earlier, this was brought to my
[21] attention because of a specific issue regarding Toyota.
[22] Q: I appreciate that, but that's not my question--
[23] MR. WEINSTEIN: No, no, no, you asked him the
[24] question. Let him give you the answer.
[25] BY MR. ROBBINS:

Page 158

[1] Q: Did anybody ever indicate to you that the NPF
[2] could not take foreign contributions from certain sources?
[3] A: Not to my recollection, no.
[4] Q: Did anybody indicate to you that the NPF could
[5] take money from whatever foreign source it wanted to because
[6] it was different than the RNC?
[7] A: It was brought to my attention that a foreign
[8] company with a U.S. subsidiary had interest in contributing.
[9] I then fleshed it out to see if it was legal. I was told
[10] that it was legal to give to the NPF, which is why I put it
[11] on this memo as a point of discussion for the chairman to
[12] make a policy decision on how he was going to deal with
[13] that.
[14] Q: I must not be making myself clear. Were you--
[15] MR. WEINSTEIN: Or you're just not liking the
[16] answer that you're receiving--
[17] BY MR. ROBBINS:
[18] Q: Were you provided--
[19] MR. WEINSTEIN: --because he said this five or six
[20] times already.
[21] BY MR. ROBBINS:
[22] Q: Were you provided with information that foreign
[23] sources, regardless of whether or not they had an American
[24] subsidiary--are you with me so far?--could contribute to the
[25] National Policy Forum?

Page 159

[1] MR. WEINSTEIN: I believe he just answered that
[2] question--
[3] MR. ROBBINS: No, sir--
[4] THE WITNESS: And I'll answer it again. No. I do
[5] not recollect being advised of that by anybody.
[6] BY MR. ROBBINS:
[7] Q: Was there a discussion at this June--at a meeting
[8] about money from foreign sources that might be coming into
[9] the National Policy Forum?
[10] A: I don't remember the meeting.
[11] Q: Was there ever any meeting about foreign money
[12] coming into the National Policy Forum?
[13] A: I don't remember any discussions in addition to
[14] this and in any meeting about foreign money, no, I don't.
[15] Q: Did you seek legal counsel in June of 1993 to
[16] assist you in understanding what money the National Policy
[17] Forum could and could not take in?
[18] A: I don't remember if I sought legal counsel.
[19] Q: To your knowledge, did the National Policy Forum
[20] consult with legal counsel about it?
[21] A: I have no idea.
[22] Q: To your knowledge, did the RNC do so?
[23] MR. WEINSTEIN: Do what?
[24] THE WITNESS: I have no idea.
[25] BY MR. ROBBINS:

Page 160

[1] Q: Was it your understanding that the limitations on
[2] what the RNC could accept were different than those on what
[3] the National Policy Forum could accept?
[4] A: Yes, I had that understanding.
[5] Q: What was your understanding of the difference?
[6] A: That the Republican National Committee legally
[7] could not accept foreign contributions; that a 501(c)(3) or
[8] (c)(4), whatever the NPF was set up to be, could legally
[9] accept foreign contributions from companies with U.S.
[10] subsidiaries.
[11] Q: And only foreign corporations from American
[12] subsidiaries?
[13] A: That's what I thought at the time, because in the
[14] premise that this was discussed, it revolved around Toyota.
[15] Q: Did you talk to anybody from Toyota?
[16] A: No.
[17] Q: Who talked to you about Toyota?
[18] A: I don't remember.
[19] Q: Somebody at the RNC or somebody at the NPF?
[20] A: I don't remember if anybody talked to me about it.
[21] I just remember hearing that it was an issue and I thought
[22] it needed to be addressed. And as my role as an advisor to
[23] the chairman, I thought it was something he should be aware
[24] of and discuss with Baroody and Hill to make a policy
[25] decision.

Page 161

[1] Q: And was it discussed with Baroody and Hill?
[2] A: I don't know. I don't remember if I was in this
[3] meeting. I often wrote memos to the chairman for his
[4] meetings. I didn't sit in every meeting.
[5] Q: Did you ever receive any information that this
[6] subject of foreign money was discussed with Baroody and
[7] Hill?
[8] A: No, I don't remember.
[9] Q: And so I understand it, do you have any
[10] recollection of any conversation with Mr. Barbour about any
[11] limitations at all on any foreign money that could legally
[12] go into the National Policy Forum?
[13] A: I don't have any specific recollections, but I do
[14] remember that we discussed the fact, and he told me that
[15] foreign companies with U.S. subsidiaries could legally give
[16] to a nonprofit like the NPF.
[17] Q: Was it your understanding that foreign
[18] corporations--that American subsidiaries--oh, I see. Let me
[19] see if I can understand this better.
[20] In your capacity as executive director of the RNC
[21] in 1993-94, was it your understanding that American
[22] subsidiaries of foreign corporations could contribute to the
[23] RNC?
[24] A: No.
[25] Q: You didn't know they could?

Page 162

[1] A: I didn't know they could at the time.
[2] Q: You didn't think that American companies--
[3] MR. WEINSTEIN: You asked him this question, and
[4] he's given you what he thought.
[5] BY MR. ROBBINS:
[6] Q: You didn't think that American companies--
[7] A: At the time I--
[8] Q: --which had foreign parents could contribute--
[9] A: At the time I didn't know the law.
[10] Q: When did you learn the law?
[11] A: Sometime during 1993. I don't remember when.
[12] Q: And when you--and by the end of 1993, did you know
[13] that American subsidiaries of foreign corporations could
[14] contribute to the RNC?
[15] A: Yes.
[16] Q: And by the end of 1993, you thought that the
[17] foreign corporations themselves could contribute to the
[18] National Policy Forum so long as they had American
[19] subsidiaries?
[20] A: Legally, yes.
[21] Q: Well, did you seek--did you ever seek to ensure
[22] the National Policy Forum was complying with any
[23] requirements applicable to it?
[24] A: No. It wasn't my job.
[25] Q: Well, it wasn't your job to do this memo, either.

Page 163

(1) MR. WEINSTEIN: Is that a question or is that an
(2) editorial statement?
(3) MR. ROBBINS: A question. He must have viewed his
(4) job as an advisor to the chairman.
(5) MR. WEINSTEIN: Then ask him the question-
(6) MR. ROBBINS: Then I'll ask if the witness can
(7) answer the question.
(8) MR. WEINSTEIN: Then ask him the question.
(9) MR. ROBBINS: I thought I did.
(10) MR. WEINSTEIN: You told him it wasn't part-
(11) THE WITNESS: Obviously, I thought this was part
(12) of my job to advise the chairman on a new organization he
(13) was setting up.
(14) BY MR. ROBBINS:
(15) Q: Well, so part of your job was to advise the
(16) chairman of the Republican Party and the NPF about these
(17) seven fund-raising issues; right?
(18) A: And a number of other things on the page, yeah.
(19) Q: Including the seven fund-raising issues?
(20) A: Yeah.
(21) Q: Did you ever advise the chairman to take any steps
(22) to ensure that contributions to the NPF were legal?
(23) A: Not that I remember, no.
(24) Q: Is this the only--did you ever have any
(25) communication with Mr. Barbour, other than the notification

Page 164

(1) you got about the infusion of money at the end of '94, about
(2) specific fund-raising prospects for the NPF?
(3) A: Not that I can remember, no.
(4) Q: Do you know who he dealt with on that?
(5) A: At the National Policy Forum?
(6) Q: Anyplace.
(7) A: No, I don't.
(8) Q: Did you ever receive a business plan from the NPF?
(9) A: Not that I remember. I may have, or he may have,
(10) which I may have seen a copy of. But I don't remember
(11) receiving it, no.
(12) Q: Did you ever see it, whether you received it or
(13) not?
(14) A: I don't remember. As I remember, there were
(15) probably numerous business plans for this operation.
(16) Q: What makes you say that?
(17) A: Because it went through, as I remember, different
(18) starts and stops.
(19) Q: And where would you see those, if you saw them?
(20) A: Physically where would I see them?
(21) Q: Yeah.
(22) A: In my office.
(23) Q: How would they have gotten to you?
(24) A: Through the mail.
(25) Q: From whom?

Page 165

(1) A: Through somebody at NPF.
(2) Q: A target list, was that ever developed?
(3) A: I don't know. Not to my recollection.
(4) Q: Did anybody at the RNC assist you on NPF matters?
(5) A: No, with the exception of Jay Banning and the
(6) lawyers who processed the money.
(7) Q: Do you know whether or not the National Policy
(8) Forum--I don't think I'm saying anything controversial. It
(9) frequently is the case that both sides through a financial
(10) transaction have their own lawyers. It's not always the
(11) case, but frequently. Do you know if the National Policy
(12) Forum had its own lawyers representing it in connection with
(13) these promissory notes between it and the RNC?
(14) A: I took for granted it did.
(15) Q: Did you ever learn whether or not it did?
(16) A: No, but I took for granted it did. I knew they
(17) had counsel. I figured they were smart enough to show it to
(18) them.
(19) Q: Who was its counsel?
(20) A: I believe it was Linda Long.
(21) Q: And how is it that you know that she was the NPF's
(22) counsel?
(23) A: Somebody told me.
(24) Q: Who?
(25) A: I don't remember.

Page 166

(1) MR. WEINSTEIN: Is this a good place to stop for
(2) lunch, counsel?
(3) MR. ROBBINS: Sure.
(4) [Whereupon, at 12:28 p.m., the deposition
(5) recessed, to reconvene at 1:30 p.m., this same day.]

Page 167

AFTERNOON SESSION

(1) [1:41 p.m.]
(2) MR. WEINSTEIN: Let the record reflect that Mr.
(3) Reed has returned from lunch and is voluntarily ready to
(4) answer more questions.
(5) MR. ROBBINS: Under oath.
(6) MR. WEINSTEIN: Under oath.
(7) Whereupon,
(8) SCOTT REED
(9) resumed the stand and, having been previously duly sworn,
(10) was examined and testified further as follows:
(11) EXAMINATION BY COUNSEL FOR THE MINORITY
(12) COMMITTEE ON GOVERNMENTAL AFFAIRS
(13) BY MR. ROBBINS:
(14) Q: Let me place before you a document which we'll
(15) have marked as Exhibit 6. This is June 28, 1994. It's a
(16) memo from Michael Baroody to the chairman of the Republican
(17) Party and the chairman of the National Policy Forum.
(18) [Reed Deposition Exhibit No. 6
(19) marked for identification.]
(20) [Witness perusing document.]
(21) BY MR. ROBBINS:
(22) Q: Now, there are--let me see if they're on the
(23) exhibit as well--notations on this document. I don't know
(24) whose they are. Let me ask you if you have ever seen
(25)

Page 168

(1) Exhibit 6 before.
(2) A: To my recollection, I don't remember ever seeing
(3) this. I do remember--
(4) MR. WEINSTEIN: Can we identify that--I mean, just
(5) identify for purposes that it's a June 28, 1994, memorandum.
(6) MR. ROBBINS: I thought I had done just that--
(7) MR. WEINSTEIN: Oh, have you? Maybe I missed--
(8) MR. ROBBINS: I'll be happy to have that done
(9) again.
(10) MR. WEINSTEIN: No, no. If you've done that,
(11) that's fine. I may have missed it.
(12) MR. SHAW: Also, I would just like to note that
(13) there is no Bates number on this document.
(14) MR. ROBBINS: Good.
(15) MR. WEINSTEIN: Okay, sir. We interrupted you.
(16) THE WITNESS: My question was have I ever seen
(17) this document.
(18) BY MR. ROBBINS:
(19) Q: Yes. My question was had you ever seen it, and
(20) your answer was?
(21) A: Not to my recollection.
(22) Q: Okay. The second paragraph refers to a discussion
(23) reflecting, according to the author of this, Chairman
(24) Barbour's "belief that considerable money could be raised
(25) for this effort from foreign sources." Does this refresh

Page 169

(1) your recollection as to whether or not you ever had any such
(2) conversation with Chairman Barbour?
(3) MR. WEINSTEIN: Wait a second. That assumes that
(4) he didn't have a recollection to start with. I believe in
(5) the morning session he answered--
(6) MR. ROBBINS: Oh, I'm--
(7) MR. WEINSTEIN: --the full extent of his
(8) discussion, so I don't think he needs to have his
(9) recollection refreshed if he didn't have a lack of
(10) recollection to start with.
(11) MR. ROBBINS: Well, let's just see about--let's
(12) see.
(13) THE WITNESS: What's your question?
(14) BY MR. ROBBINS:
(15) Q: Do you have a recollection of conversations you
(16) had with Chairman Barbour about raising "considerable money"
(17) from foreign sources?
(18) A: I never had a conversation with him about raising
(19) considerable money from foreign sources, no.
(20) Q: Did you ever have any conversation with Chairman
(21) Barbour about raising money from foreign sources other than
(22) what you've already testified to?
(23) A: Not that I can remember, no.
(24) Q: Did you ever have a conversation with Mr. Baroody
(25) about raising money from foreign sources?

Page 170

(1) A: Not that I remember, no.
(2) Q: Did you ever have a conversation with anybody at
(3) NPF to that effect?
(4) A: No, not that I remember.
(5) Q: Did you ever have a conversation with anybody at
(6) NPF about fund-raising strategies that you can remember?
(7) A: Not that I can remember specifically, no.
(8) Q: Whether or not you can remember it specifically or
(9) generally, any such conversation?
(10) A: No.
(11) Q: Can you recall any conversation with either
(12) anybody at the RNC or anybody at the NPF about taking steps
(13) to ensure that the NPF's tax-exempt status was not
(14) jeopardized?
(15) A: No, I don't remember any conversations on that at
(16) all.
(17) Q: Page 2 of this exhibit, if you'll turn to that--
(18) you may be there already.
(19) A: I'm there.
(20) Q: The third full paragraph that begins with the word
(21) "Virtually," do you see that Mr. Baroody--
(22) MR. WEINSTEIN: Whose underlinings are these, may
(23) I ask?
(24) MR. ROBBINS: I don't know.
(25) MR. WEINSTEIN: They're not yours?

Page 171

(1) MR. ROBBINS: No, they're not mine.
(2) MR. WEINSTEIN: When I say "yours," they're not
(3) lawyers or--
(4) MR. ROBBINS: I just don't know. As I say, I
(5) don't know.
(6) MR. WEINSTEIN: Okay.
(7) MR. ROBBINS: I can't say any more ways than that
(8) that I don't know.
(9) BY MR. ROBBINS:
(10) Q: It says, "Instead, I met routinely with your RNC
(11) staff." Did you meet routinely with Mr. Baroody?
(12) A: I don't know how you define routinely. I met with
(13) Baroody a handful of times. Usually the chairman was there,
(14) so it was the chairman meeting with Baroody.
(15) Q: Whether or not--I don't really care who called for
(16) the meeting. Did you participate in meetings with Mr.
(17) Baroody?
(18) A: Yes.
(19) Q: How frequently?
(20) A: Maybe once or twice a month for a period in the
(21) beginning.
(22) Q: Lasting how long?
(23) MR. WEINSTEIN: The meetings lasted how long or
(24) the period--
(25) MR. ROBBINS: I'm sorry.

Page 172

(1) THE WITNESS: I can't put a direct time line
(2) around it. I mean, there were periodic meetings. If I was
(3) available and had lesser things to do, I would be in the
(4) meeting.
(5) BY MR. ROBBINS:
(6) Q: Well, I don't really know what that tells us. I
(7) guess my question is: Can you give me an estimate on how
(8) frequently you met with Mr. Baroody?
(9) MR. WEINSTEIN: During what period?
(10) MR. ROBBINS: At any period.
(11) THE WITNESS: I probably had 12 meetings, maybe 15
(12) meetings over the two-year period with Baroody that I was in
(13) the room with Baroody.
(14) BY MR. ROBBINS:
(15) Q: And what were the purposes of these--what was the
(16) purpose or what were the purposes of these meetings?
(17) A: Well, they had to do with the NPF and the
(18) direction it was going.
(19) Q: In what respect?
(20) A: Sometimes in respect to how it was running as an
(21) organization, what it's political goals were, sometimes in
(22) respect to the direction it was going, what it was getting
(23) accomplished. They were general meetings. I was not
(24) managing the National Policy Forum, and so I didn't--
(25) Q: And I didn't ask you if you were managing. I'm

Page 173

(1) just asking you about whether you participated in the
(2) meeting. So I'm not interested in what you didn't do. I'm
(3) just asking about the meetings that you attended.
(4) A: And I answered you.
(5) Q: Is there any other subject you can recall being
(6) discussed at any of those meetings?
(7) A: I'm sure we discussed at some time the progress on
(8) the forum meetings around the country, were they taking
(9) place. I'm sure we discussed at some time different ideas
(10) of Republican leaders that could play leadership roles. I'm
(11) sure we discussed at some time the book and the publication
(12) that was going to be put in place, was that going to get
(13) done on time. Those three things come to mind.
(14) Q: And you have not mentioned fund-raising as
(15) anything which came up. Is that something which came up?
(16) A: It may have come up. I don't remember it as
(17) something that came up often. As I told you earlier, my
(18) discussions about fund-raising were with the chairman.
(19) Q: Well, now, if Mr. Baroody says--and I know you're
(20) not Mr. Baroody and you don't know what he's referring to,
(21) obviously, you're not in his mind. But when he says that he
(22) met routinely with your RNC staff, do you know who else he
(23) met with even from time to time, other than yourself and Mr.
(24) Barbour, who were employees of the RNC?
(25) A: No, I don't know what he's talking about. It

Page 174

(1) could have been, you know, turning in paper to Sanford
(2) McAllister that had to get to Haley, who was his executive
(3) assistance.
(4) MR. WEINSTEIN: Who was Haley's executive--
(5) THE WITNESS: Haley's executive assistant. I
(6) don't know what he's talking about.
(7) BY MR. ROBBINS:
(8) Q: Your testimony is, as I understand it, that you
(9) have no knowledge of anybody other than yourself and Mr.
(10) Barbour who, in fact, met with Mr. Baroody?
(11) MR. WEINSTEIN: I don't know if that's his
(12) testimony. I think his testimony was he wasn't sure who
(13) meeting routinely with RNC staff was.
(14) BY MR. ROBBINS:
(15) Q: Would you answer my question?
(16) A: Your question is?
(17) Q: You don't have any knowledge--your testimony is
(18) you don't have any knowledge of anybody who Mr. Baroody met
(19) with at the RNC other than Mr. Barbour and yourself?
(20) A: I can remember one meeting where Sanford
(21) McAllister was in the room with Mr. Baroody and Don Fierce
(22) was in the room with Mr. Baroody.
(23) Q: Okay. And Don Fierce, you said, was the liaison
(24) with the congressional delegation?
(25) A: Congressional relations.

Page 175

(1) Q: Congressional relations. And what was the
(2) discussion, what was discussed at the meeting involving
(3) yourself and Mr. Baroody and Mr. Fierce, and perhaps others?
(4) What was discussed at that meeting?
(5) A: Well, I don't remember specifically, but it was
(6) probably the issues I just laid out earlier that would be
(7) ongoing issues, progress of the forums around the country,
(8) people that were playing leadership roles, where we were--
(9) when we were going to get to our final product.
(10) Q: And never funding that you recall?
(11) A: I don't remember fund-raising being a big issue at
(12) those meetings, no.
(13) Q: Anybody else at the RNC with whom you believe Mr.
(14) Baroody met?
(15) A: Not that I can remember, no.
(16) Q: Take a look at the next paragraph. It says, "I
(17) had understood at the outset this would be an organization
(18) separate from the RNC. Though both would be chaired by you,
(19) they would operate distinctly. I had this understanding not
(20) only because you and others told me so, but because the
(21) deliberate decision had been made to organize the NPF under
(22) Section 501(c)(4) of the Federal Tax Code. That provision
(23) requires separate operation. Especially in recent months,
(24) it has become increasingly difficult to maintain the fiction
(25) of separation."

Page 176

(1) I take it that you were at the RNC when the NPF
(2) was actually organized; is that correct?
(3) A: Correct.
(4) Q: And did you participate in that?
(5) MR. WEINSTEIN: Participate in what?
(6) MR. ROBBINS: The organization of the NPF.
(7) THE WITNESS: I possibly did early in the early
(8) stages. A lot of that we discussed this morning.
(9) MR. WEINSTEIN: What do you mean by organization?
(10) I mean, he--
(11) MR. ROBBINS: There's no question pending now.
(12) MR. WEINSTEIN: Well, but, I mean, if you want a
(13) clear record, organization means a lot of different things.
(14) You know, was he on the staff over there? What did he do
(15) for the chairman? I mean, that means a lot of different
(16) things?
(17) MR. ROBBINS: Are you all finished?
(18) MR. WEINSTEIN: Well, I'm finished whenever you're
(19) finished. I'm just trying to help you clarify the question.
(20) MR. ROBBINS: I appreciate that.
(21) BY MR. ROBBINS:
(22) Q: Did you participate at all in any aspect of the
(23) organization of the NPF?
(24) A: Yes.
(25) Q: What did you do?

Page 177

(1) A: I was there as an advisor to the chairman as it
(2) was going through the set-up stages.
(3) Q: What did you do to advise--
(4) MR. WEINSTEIN: But you asked this this morning.
(5) I mean, why--why are we asking--or why are you asking the
(6) same exact question every few hours? I think it's--I think
(7) it's abusive. I think it's badgering the witness. I think
(8) it's unfair. And I will put on the record that I think it
(9) is really abuse of process, and if this is the reason why we
(10) are here for several hours so we can ask the same question
(11) over and over again, then I think that's improper. And with
(12) that, I will let him, if he can remember, try and repeat his
(13) answer that he said this morning.
(14) MR. ROBBINS: Thank you.
(15) BY MR. ROBBINS:
(16) Q: Would you do so, please?
(17) A: What's your question?
(18) Q: What did you do to advise the chairman with
(19) respect to the organization of the NPF?
(20) A: I gave him some ideas on some of the types of
(21) people that could play a leadership role as co-chairmen of
(22) the different policy groups.
(23) Q: Anything else?
(24) A: That's probably the most creative thing I did for
(25) him.

Page 178

(1) Q: Well, actually, I'm not that interested in your
(2) being modest or rating the quality of the ideas that you
(3) had, particularly. What I'm interested in is every aspect
(4) of the organization in which you played a role.
(5) A: Okay, and I've answered your question.
(6) Q: Okay. Did you discuss, for example, organizing it
(7) as a tax-exempt entity?
(8) A: I don't remember if I discussed that or not. If
(9) I'm not mistaken, that was part of when he laid out his plan
(10) on why he was going to run for chairman. I believe it may
(11) have been designed at that time--
(12) Q: By him?
(13) A: --prior to my time.
(14) Yeah. I don't remember if we discussed that or
(15) not.
(16) Q: Okay. This memo was written, obviously, in June
(17) of 1994, and he says, quote, "Especially in recent months,
(18) it has become increasingly difficult to maintain the fiction
(19) of separation."
(20) Did anything happen in 1994 which suggested that
(21) any separation between the two entities has ceased to be?
(22) A: Not in my eyes. I think this is just his
(23) editorial comments.
(24) Q: Do you know if he's referring to any idea?
(25) A: No.

Page 179

(1) Q: Did he have a discussion with you about a concern
(2) that the RNC and the NPF were ceasing to be separate?
(3) A: No, but, you know, he was--as I remember, he
(4) became a little frustrated about his leadership role at the
(5) NPF, and that may have been established in this letter he
(6) wrote.
(7) Q: You felt that this was a function of him being
(8) frustrated?
(9) MR. WEINSTEIN: He doesn't know. He's saying he
(10) was frustrated, and he's speculating.
(11) MR. ROBBINS: Oh, okay.
(12) BY MR. ROBBINS:
(13) Q: Did he indicate why he was frustrated?
(14) A: No. I could just tell he was.
(15) Q: How?
(16) A: I could just tell he was frustrated.
(17) Q: Did he identify any respect in which he was
(18) frustrated?
(19) A: No.
(20) Q: Did he indicate in any way any aspect of his
(21) frustration?
(22) A: No. I just think he came to the conclusion that
(23) this thing wasn't moving on as well as he had hoped it would
(24) have a year ago when he signed on, and I could see it in the
(25) work product.

Page 180

(1) Q: Well, you met with him 12 to 15 times over the
(2) 2-year period, correct?
(3) A: Approximately, as I can remember.
(4) Q: Did he articulate any satisfaction about any
(5) aspect of the NPF's operation or its relationship with the
(6) RNC?
(7) A: No, no.
(8) Q: Did the chairman, Chairman Barbour, indicate to
(9) you any information he had about any respect in which Mr.
(10) Baroody was frustrated?
(11) A: I think there may have been some comments about
(12) the slow pace of some of the progress over there on doing
(13) things, yeah.
(14) Q: The chairman's frustration with the NPF?
(15) A: Uh-huh. [Nodding head up and down.]
(16) Q: Correct? You have to say yes or no, for the
(17) record.
(18) A: Yes.
(19) Q: What was it that the chairman indicated he was
(20) frustrated by?
(21) A: Some of the pace of the Forum and the forums it
(22) was having around the country, the slowness of getting them
(23) going.
(24) Q: Did he ask you to play any role in improving the
(25) situation?

Page

Page 184

(1) A: No.
(2) Q: But the chairman never indicated that Mr. Baroody
(3) was frustrated?
(4) A: No.
(5) Q: Now, the next paragraph says, quote, among other
(6) things, my strong view that our 501(c)(4) application
(7) require that we not respond to pressure from party
(8) organizations either to cancel the event, referring to the
(9) Fresno forum, or move an invited listener from the panel who
(10) were unequivocally shared by outside counsel to the NPF and
(11) communicated by both of us directly to you. These concerns
(12) were dismissed by you and by one of your staff as so much
(13) legal B.S. Do you know what that refers to?
(14) A: I don't remember. Fresno forum sounds like a
(15) place where they were having a forum.
(16) Q: Yes. Did--
(17) A: There were hundreds of these things, if I'm not
(18) mistaken, and I didn't really follow them that closely.
(19) Q: Well, was there anybody other than yourself at the
(20) RNC who was designated as the person or a person to deal
(21) with the NPF?
(22) A: No, but I wasn't designated to deal with the NPF.
(23) Q: You weren't either. Was anybody?
(24) A: Not to my knowledge, no.
(25) Q: Do you know of anybody at the RNC who regularly

Page 182

(1) received communications from the NPF other than yourself and
(2) Mr. Barbour?
(3) A: Except for staff people that work for the
(4) chairman, that they may have gone to him before they went to
(5) Haley.
(6) Q: Which staff people are you thinking of besides
(7) McAllister?
(8) A: Sanford, probably. Maybe Barbara, who was his
(9) secretary.
(10) Q: Did you ever learn that counsel for the NPF had
(11) communicated concerns to the RNC about the potential
(12) jeopardizing of NPF's tax-exempt status?
(13) A: No.
(14) Q: Never heard of any such thing?
(15) A: No.
(16) Q: The next page, the paragraph that begins, "Other
(17) examples," it says, "Under other examples, underscore my
(18) concern that separate between NPF and RNC is a fiction. The
(19) interim health care report was not released because it was
(20) thought that doing so would interfere with GOP advertising
(21) you had undertaken." Any recollection at all about what
(22) that involved?
(23) A: No, none.
(24) Q: It says, quote, "I note one other example that
(25) raises the separate organization issue. The production of

Page 183

(1) the Listening to America summary report was turned over to
(2) RNC staff. I was informed they would volunteer their time,
(3) which I believe to be another fiction." Any recollection of
(4) that?
(5) A: I believe at the time, there was a problem with
(6) the publication getting done on time, and I believe at the
(7) time, one of the young men that worked down in our
(8) Publication Division, who was very competent, volunteered to
(9) go help them pull this project together. It was a project
(10) with a lot of moving parts, with getting copy approved and
(11) to a printer, so that a product could actually come out at a
(12) date certain.
(13) Q: Did the chairman have a chief of staff?
(14) A: Nobody by the title of chief of staff, no.
(15) Q: Who functioned that way?
(16) A: I did as the executive director.
(17) Q: The next paragraph says, quote, "The sentiment of
(18) much of the staff here is that we are operated like a
(19) division of the RNC. You may recall a meeting last fall
(20) when I voiced my concern and disappointment that you and I
(21) had not spent much time at all together," and there is a
(22) parentheses. Then, the next sentence says, "Your chief of
(23) staff objected quite forcefully to my statement. He and I
(24) had met routinely," he said. "My point was that you and I
(25) had not."

(1) If he's referring to--he must be referring to you,
(2) right?
(3) A: Uh-huh. [Nodding head up and down.]
(4) Q: Yes?
(5) A: He must be.
(6) MR. WEINSTEIN: Do you know?
(7) THE WITNESS: Well, if there was no--I was the
(8) only person that operated like a chief of staff, but that
(9) wasn't my title.
(10) BY MR. ROBBINS:
(11) Q: But if there is a chief of staff at the RNC, '93,
(12) '94, it's you, right?
(13) A: Nobody called me the chief of staff at the RNC. I
(14) was the executive director.
(15) Q: Did you ever tell Mr. Baroody, Mr. Reed, that you
(16) and he had met routinely over the previous 18 months?
(17) A: No.
(18) Q: You had met at least once every four to six weeks,
(19) correct?
(20) A: Well, as I said, I thought it was about 12 to 15
(21) times.
(22) Q: Over the course of--
(23) A: Over the course of a year.
(24) Q: Over the course of the year or the two years?
(25) A: Well, if I'm not mistaken, Baroody didn't come on

Page 185

(1) the scene until around June of '95, and according to this,
(2) he resigned--
(3) MR. WEINSTEIN: June of '93?
(4) THE WITNESS: I mean, June of '93. And he
(5) resigned June of '94. So that's about a year.
(6) BY MR. ROBBINS:
(7) Q: Okay, fair enough. So that, in the year that he
(8) was head of the NPF, you met with him about 12 to 15 times?
(9) A: I would guesstimate about 12 to 15 times.
(10) MR. WEINSTEIN: And I think when he's referring to
(11) years, he's referring to calendar years '93 and '94, and the
(12) year that Baroody was there was the calendar year. It was a
(13) 12-month--
(14) MR. ROBBINS: Making sure I understand--
(15) THE WITNESS: That's what I was referring to.
(16) BY MR. ROBBINS:
(17) Q: In the year that Mr. Baroody was at NPF, you met
(18) with him 12 to 15 times?
(19) A: I guess 12 to 15 times, yes.
(20) Q: Let's take a look at another document. July 28,
(21) 1993.
(22) MR. ROBBINS: Let's have that marked as the next
(23) exhibit.
(24) [Reed Deposition Exhibit No. 7
(25) marked for identification.]

Page 186

(1) [Witness perusing document.]
(2) MR. SHAW: Excuse me, Jeff. I just want to note
(3) for the record that this document does not have a Bates
(4) number on it.
(5) MR. ROBBINS: Okay.
(6) MR. SHAW: Would you have any idea where this
(7) document came from, and has this been shared with the
(8) Majority?
(9) MR. ROBBINS: I don't know where it came from, and
(10) I assume--I can only assume that it has been shared with the
(11) Majority.
(12) MR. WEINSTEIN: See, I must confess something that
(13) I myself am a little mystified about. Some of these
(14) documents indicate that they are--were received by facsimile
(15) from the National Policy Forum on July 28, 1993 at
(16) approximately 12:15. Other documents--other parts of the
(17) document do not, i.e., the last page and, in fact, the
(18) facsimile cover page. I think the second page does have the
(19) fax I.D., but it's just been poorly Xeroxed. So it is
(20) unclear whether or not this is, in fact, one document.
(21) MR. ROBBINS: Okay. I take your point, but I'm
(22) going to keep asking questions.
(23) BY MR. ROBBINS:
(24) Q: Did you ever see this before?
(25) A: Not to my recollection, no.

Page 187

(1) Q: Are you--any other Scott that you remember working
(2) at the RNC in '93, '94?
(3) A: Not that I remember, no.
(4) Q: The fax number was 863-8773?
(5) A: I really don't remember.
(6) Q: Haley would have been Haley Barbour. Sanford
(7) would have been Sanford McAllister. Let's hold who Scott
(8) was for a second. Henry was who? Was there a Henry?
(9) A: It could have been Henry Barbour.
(10) Q: Henry Barbour? Who did Henry Barbour work for in
(11) '93, '94?
(12) A: The Finance director, Al Mitchler.
(13) Q: Of the?
(14) A: Republican National Committee.
(15) Q: And Millie M., who was that?
(16) A: I don't have a clue.
(17) Q: All right. Or is it Mike M?
(18) A: I don't know.
(19) Q: The fourth page of this exhibit--
(20) MR. WEINSTEIN: You mean the one that is indicated
(21) it says page 4 up on here?
(22) MR. ROBBINS: Yes. I believe the same 4 that I
(23) was thinking of.
(24) MR. WEINSTEIN: Okay.

BY MR. ROBBINS:

Page 188

(1) Q: It says Ron Lauder, TU out, and it says need to
(2) discuss this with--or w/Scott R. Did you have a
(3) conversation with Kelly--is it Guesnier?
(4) A: Guesnier.
(5) Q: --Guesnier about approaching Mr. Lauder for money?
(6) A: Not to my recollection, no. I don't know why I
(7) would have said that.
(8) Q: David Koch. Did you ever participate in any
(9) discussion about raising money for Mr. Koch for the NPF?
(10) A: No, not to my recollection.
(11) Q: Did you ever participate in any conversation about
(12) raising money from any of the individuals identified on this
(13) document for NPF?
(14) A: Not that I remember, no. I was not engaged in
(15) raising money for the NPF.
(16) Q: Right. Whether or not you were--
(17) A: Well, I wasn't.
(18) Q: Jorge Maas, do you know that name?
(19) A: Yes.
(20) Q: Who is that?
(21) A: He's the head of the Cuban-American Foundation out
(22) of Miami.
(23) Q: Even if you have not seen this document or can't
(24) remember seeing it, does this refresh your recollection
(25) about ever receiving written communications or oral

Page 189

(1) communications from anybody at the NPF about fund-raising?
(2) MR. WEINSTEIN: It's not clear that his memory
(3) needs to be refreshed. He has already answered the
(4) question, and--
(5) MR. ROBBINS: I can help you out, no problem.
(6) MR. WEINSTEIN: Please.
(7) BY MR. ROBBINS:
(8) Q: Other than what you may have already testified to,
(9) does this refresh your recollection as to any additional
(10) communications you had with anybody from NPF about
(11) fund-raising?
(12) A: It doesn't refresh my memory, no. It looks like a
(13) standard memo that was going to Haley about the status of
(14) fund-raising and some action items for him, and obviously, I
(15) was copied on them.
(16) Q: What was your practice when you got faxes?
(17) A: Not all faxes always got to me.
(18) Q: Right, sure. What about the faxes that got to
(19) you?
(20) A: If they were important, I would discuss them with
(21) the chairman, if they were relevant to him.
(22) Q: And if you read them or decided that you--
(23) A: If it wasn't something I was dealing with, I'd
(24) throw it in the garbage.
(25) Q: Would you read it first? I take it, you would

Page 190

(1) read it in order to--
(2) A: Yes, I would read it.
(3) Q: Okay. So your practice when you got faxes that
(4) did get to you would be to read them, correct?
(5) A: Correct.
(6) Q: Did you ever file them someplace?
(7) A: Not that I remember. I didn't keep a lot of
(8) files. It really wasn't necessary at an organization that
(9) had people that were in their position doing their jobs.
(10) Q: Did you keep any files at all?
(11) A: I probably did on some different status of races
(12) and things like that, polling data I would receive. I know
(13) I read all the field reports we'd get from the field. I
(14) don't know if I kept them all, but I know I didn't leave
(15) with them.
(16) Q: Did you ever destroy any documents, other than
(17) throwing them out routinely with--
(18) A: No.
(19) Q: Was there a place at the RNC where files of
(20) documents that weren't being used day to day were kept, some
(21) kind of storage area or central filing area?
(22) A: I believe the RNC had an off-out-of-the-building
(23) facility where they stored old documents, yeah, somewhere
(24) like a rental place, boxes from old records. I think you
(25) have to keep FEC records back to 8 or 10 years.

Page 191

(1) Q: Where was that facility located?
(2) A: Somewhere in Maryland. I don't know where.
(3) Q: Has that facility been searched?
(4) MR. WEINSTEIN: We're not going to answer any
(5) questions that don't pertain to information regarding Mr.
(6) Reed. If you want to raise that after the deposition, I'm
(7) more than happy to talk to your or other folks about it.
(8) MR. ROBBINS: I have no difficulty doing it on the
(9) record.
(10) MR. WEINSTEIN: I don't want to waste Mr. Reed's
(11) time.
(12) MR. ROBBINS: Just one little answer?
(13) MR. WEINSTEIN: We're going to be walking out the
(14) door at 4:30, and--
(15) MR. ROBBINS: Okay.
(16) MR. WEINSTEIN: --if you want to take your time
(17) doing that--
(18) MR. ROBBINS: Sure, go ahead.
(19) MR. WEINSTEIN: --then after we're done, the
(20) record will--
(21) MR. ROBBINS: You can leave at 4:30, but I just
(22) wondered if you would answer my question.
(23) MR. WEINSTEIN: Mr. Robbins, get on with this,
(24) please.

BY MR. ROBBINS:

Page 192

(1) Q: Was it your practice--how do you know that this
(2) facility was kept in Maryland?
(3) A: Because we would normally have to look up records
(4) from something from the past from before I got there, from
(5) before the chairman got there, and Jay Banning, who managed
(6) the facility, would send somebody out to retrieve them.
(7) Q: So Jay Banning was the person with the most
(8) knowledge of that facility?
(9) A: I believe so, yeah.
(10) Q: And it was one of his jobs to administer it?
(11) A: He was the director of Administration. That was
(12) part of Administration.
(13) Q: And your understanding, were there lists kept of
(14) the files if--
(15) A: I don't have a clue how it was organized. I
(16) imagine it was organized, though.
(17) Q: Is there anybody else in Mr. Banning's shop, so to
(18) speak, that would have knowledge about how those files were
(19) kept?
(20) A: Not--I don't know.
(21) Q: At any time, did the RNC impose any conditions on
(22) the making of loans to the NPF?
(23) A: Well, if I'm not mistaken, from the documents you
(24) showed me this morning, there were conditions in there about
(25) the repayment with interest.

Page 193

[1] Q: You're right. You're absolutely right about that.
[2] What I meant was anything in addition to that.
[3] A: Not to my knowledge, no.
[4] MR. SHAW: He's referring to Exhibit 4.
[5] BY MR. ROBBINS:
[6] Q: Did you ever have any discussion about
[7] fund-raising goals for the NPF?
[8] A: Not to my recollection.
[9] MR. ROBBINS: Off the record.
[10] [Discussion off the record.]
[11] MR. WEINSTEIN: Where were we now?
[12] BY MR. ROBBINS:
[13] Q: Did you ever participate in any conversation about
[14] fund-raising goals for the NPF?
[15] MR. WEINSTEIN: Why are we asking this same
[16] question now, the fourth or fifth time?
[17] MR. ROBBINS: You're taking more time.
[18] MR. WEINSTEIN: Are you asking him other than what
[19] he has already answered to in the past?
[20] MR. ROBBINS: Actually, I am just asking the
[21] question.
[22] BY MR. ROBBINS:
[23] Q: So, if you'd answer it, that would be great.
[24] A: Ask it again.
[25] Q: Did you participate in any conversations with

Page 194

[1] anybody about fund-raising goals for the NPF?
[2] A: I'm sure I participated in conversations with the
[3] chairman about some of the goals in the early days, yeah,
[4] and how it was going to get up and running because I needed
[5] to know how much money we were going to have to lend it.
[6] Q: What do you remember about conversations with the
[7] chairman about fund-raising goals?
[8] A: I don't remember anything in specific.
[9] Q: Did you discuss with him a fund-raising plan for
[10] the NPF?
[11] A: I don't remember discussing with him a
[12] fund-raising plan. I'm sure there was one that existed.
[13] Q: Did you discuss with him, at the beginning or
[14] otherwise, specific individuals who would be approached or
[15] who might be approached for money?
[16] A: I'm sure I did. I don't remember who I mentioned,
[17] but I believe at the time, after we announced it, there was
[18] a lot of interest in this, and people were calling and
[19] showing interested, and I passed it along.
[20] Q: How was it announced?
[21] A: Well, as I remember, it was one of the things that
[22] was part of his plank when he ran for chairman throughout
[23] December and January, and it received some press coverage at
[24] the time. Then, I believe, it was formally announced in
[25] April with a press conference with Haley, and I believe some

Page 195

[1] members of the board may have been there, but I'm not sure.
[2] I wasn't involved in the press conference.
[3] Q: Was it a joint RNC-NPF announcement?
[4] A: No. It would have been a straight-out NPF
[5] announcement. I'm sure it wasn't a joint announcement.
[6] Q: You're sure about that?
[7] A: Yeah.
[8] Q: How are you so sure about that?
[9] A: Because we wouldn't have done anything like that,
[10] because they were separate organizations.
[11] Q: Did the chairman from time to time take
[12] fund-raising trips on behalf of the NPF? By the chairman, I
[13] mean Mr. Barbour.
[14] A: He did a lot of traveling and a lot of
[15] fund-raising. I don't remember any being specifically for
[16] NPF.
[17] Q: Whenever he did traveling, were the expenses paid
[18] for by RNC funds?
[19] A: Yeah, to my knowledge. We had a separate budget
[20] item for the chairman's travel.
[21] Q: Did he ever attend any of the NPF forums?
[22] A: I'm not sure.
[23] Q: Did you?
[24] A: No. I definitely didn't.
[25] Q: Did anybody else at the RNC ever do so?

Page 196

[1] A: Nobody on the staff that I'm aware of. He may
[2] have gone to one of the early ones, but I just don't
[3] remember.
[4] Q: Do you know whether or not the RNC paid for that
[5] or the NPF paid for that?
[6] A: I don't have any idea. First of all, I don't know
[7] if he went.
[8] Q: Right.
[9] A: And if he did, I don't know how it was paid for.
[10] Q: Did the RNC ever interview potential employees for
[11] the NPF?
[12] A: The RNC-anybody in particular or-
[13] Q: Well, you're right. You or Mr. Barbour?
[14] A: I know Mr. Barbour did, especially for hiring
[15] Baroody. I probably met with them after they were either
[16] hired or not hired. I knew Baroody from around town
[17] already, but I don't think I would-I know I wasn't in the
[18] chain of command for a decision on somebody who would be
[19] hired, but I probably met them, either on the way in or the
[20] way out. I'm not aware of anybody else at the RNC that
[21] would have met with anybody about hiring practices.
[22] MR. WEINSTEIN: At the NPF?
[23] THE WITNESS: At the NPF.
[24] BY MR. ROBBINS:
[25] Q: Did you-

Page 197

[1] A: And-
[2] Q: Go ahead.
[3] A: Just one other last thing-
[4] Q: Sure.
[5] A: -I believe once Baroody was hired and a few of
[6] the other senior people, that Baroody did all the hiring, if
[7] I'm not mistaken, or close to all the hiring.
[8] Q: Did you ever review a budget of the NPF?
[9] A: I don't specifically remember reviewing a budget,
[10] but I wouldn't be surprised if I didn't-I did-if I did.
[11] Q: Why?
[12] A: Because probably early on, once we started, when
[13] we were laying out the plan on how we were going to lend
[14] this institution money to get started, I needed to have a
[15] basic understanding of cash flow on what we were going to
[16] need to make available the loan, and I wanted to have that
[17] built into my cash flow.
[18] Q: You never met Mr. Young or any one of the Young
[19] Brothers?
[20] A: I never met Mr. Young. Never met Mr. Young, never
[21] met Mr. Volcansek, and never met Mr. Young, Jr.
[22] Q: Did you ever speak to them?
[23] A: No.
[24] Q: Ever receive any communication of any kind from
[25] either of them?

Page 198

[1] A: Not unless you show me some fax I never got, no.
[2] Q: Did you have any contact in '95 or '96 with
[3] anybody about the NPF-RNC financial relationship?
[4] A: In '95 and '96?
[5] Q: Yes.
[6] A: No, not to my recollection. I had other things
[7] going on in my life.
[8] Q: All right.
[9] MR. WEINSTEIN: Can we get up and stretch our legs
[10] for a second, sir?
[11] MR. ROBBINS: Sure.
[12] [Recess.]
[13] MR. ROBBINS: There is a large area of inquiry
[14] which, in deference to your request that counsel-additional
[15] counsel be present, we are willing not to begin today, on
[16] the condition, obviously, that you and Mr. Reed-that Mr.
[17] Reed, in any event, will return to complete his deposition
[18] reasonably promptly.
[19] MR. WEINSTEIN: Our position is really clear, and
[20] I don't think that you will be upset by it. Mr. Reed is
[21] here voluntarily. He is prepared to answer all questions.
[22] Counsel for Dole for President could not be here. We will
[23] talk to them about the rescheduling of this. I don't know
[24] Mr. Reed's schedule. I don't know Mr. Gross' schedule, but
[25] when this is done, we will sit down and we will get out a

Page 199

(1) calendar and we will get them altogether.
 (2) MR. ROBBINS: Yes. I would prefer that we work
 (3) this out without a formal Committee thing, and I am sure we
 (4) can.
 (5) MR. WEINSTEIN: I don't think-as I said, he is
 (6) here voluntarily, and I want to make sure to put on the
 (7) record this, and I don't know what your plans are. Maybe
 (8) Mr. Shaw does or he doesn't. I don't know, but in the event
 (9) that Mr. Reed is called to the next stage of these
 (10) proceedings, he will appear before the entire Committee
 (11) voluntarily. We only ask-he is a sole proprietor of a
 (12) business. So we only ask that you give us some notice-
 (13) MR. ROBBINS: Okay.
 (14) MR. WEINSTEIN: -because this is-when you are
 (15) out of the office, there basically isn't an office.
 (16) MR. ROBBINS: Okay.
 (17) MR. WEINSTEIN: But he will appear voluntarily.
 (18) Do you have any sense as to whether or not this is
 (19) going to happen? I mean, I'm not asking you for any sort of
 (20) guarantees, but in order for him to plan his life, because
 (21) he has clients that ask him to make commitments, can you
 (22) give us a ball-park estimate of something?
 (23) MR. ROBBINS: I cannot.
 (24) MR. WEINSTEIN: Okay.
 (25) THE WITNESS: We'll wait until we get it.

Page 200

(1) MR. WEINSTEIN: But I want to make clear, he will
 (2) appear voluntarily at a proceeding before the full
 (3) Committee.
 (4) MR. ROBBINS: Okay. That said, I'm going to ask
 (5) Mr. Sklamberg to inquire on a discrete and, I think,
 (6) relatively short line of inquiry, and we will probably
 (7) suspend today earlier than we otherwise would have because
 (8) we have agreed to defer certain other lines of questioning.
 (9) MR. WEINSTEIN: Agreed. Fair. Thank you.
 (10) [Discussion off the record.]
 (11) BY MR. SKLAMBERG:
 (12) Q: "Short," unfortunately, is a relative term, but I
 (13) think this won't take all that long.
 (14) I want to ask you some questions about Republicans
 (15) Abroad.
 (16) A: Okay.
 (17) Q: And if you could just describe to me what in
 (18) general terms Republicans Abroad does.
 (19) A: Very little. Republicans Abroad is, I believe, an
 (20) official auxiliary club.
 (21) MR. WEINSTEIN: Do you know whether it is, or are
 (22) you guessing?
 (23) THE WITNESS: I'm not-I'm pretty sure it's an
 (24) official auxiliary, but I'm not sure.
 (25) BY MR. SKLAMBERG:

Page 201

(1) Q: What is an auxiliary?
 (2) A: It is an organization that has been recognized by
 (3) the Republican National Committee as a part of the
 (4) Republican National Committee.
 (5) Q: Give me some examples other than-
 (6) A: The Young Republicans, College Republicans,
 (7) Republicans Abroad, and I think there's something called the
 (8) Heritage Foundation or the Republican Heritage Group or
 (9) something.
 (10) Q: To what does it entitle a group when it's an
 (11) auxiliary group? Does it just mean they can use the
 (12) Republican name or-
 (13) A: I believe it entitles them to attend the two
 (14) annual meetings for the Republican National Committee, the
 (15) summer and the winter meeting, and I believe it allows them
 (16) to use the logo for whatever activities they do. Besides
 (17) that, I don't think it involves anything.
 (18) Q: Does it involve any funding from the RNC to the
 (19) organizations?
 (20) A: Yeah. I believe we fund it at \$25,000 a year.
 (21) Q: Okay, \$25,000 a year.
 (22) MR. WEINSTEIN: Mr. Sklamberg, is your question as
 (23) to the time frame when Mr. Reed was executive director or as
 (24) to now?
 (25) MR. SKLAMBERG: My time frame is as to when Mr.

Page 202

(1) Reed was executive director.
 (2) MR. WEINSTEIN: Okay.
 (3) THE WITNESS: Okay. Well, I believe it was 25 a
 (4) year, which mostly paid for to have an office and overhead.
 (5) BY MR. SKLAMBERG:
 (6) Q: How was that figure arrived at? Did they submit a
 (7) budget?
 (8) A: Yeah. They submitted a budget request to the
 (9) Budget Committee. The Budget Committee approved a budget.
 (10) Q: And all the auxiliary groups submitted similar
 (11) requests?
 (12) A: Yeah.
 (13) Q: Who was on the Budget Committee?
 (14) MR. WEINSTEIN: When?
 (15) BY MR. SKLAMBERG:
 (16) Q: At the period that you were the chief operating
 (17) officer.
 (18) A: I believe eight members. It was made up of eight
 (19) members. I don't remember who.
 (20) Q: Okay. Who chaired it?
 (21) A: I believe Al Poidovant from Georgia was the
 (22) chairman, but I don't remember.
 (23) Q: Poidovant?
 (24) A: Poidovant.
 (25) Q: Okay. And were you on the committee?

Page 203

(1) A: I wasn't formally on the committee, but I would go
 (2) to the Budget Committee meetings and make the presentation
 (3) for the budget to the committee members because-
 (4) Q: Okay. So they submitted-
 (5) A: -I was the one that knew the budget.
 (6) Q: So they submitted a formal written-
 (7) A: I don't remember if it was ever formally written.
 (8) I just remember we decided what we wanted them to be.
 (9) Q: Okay, but someone there said to someone in the
 (10) Finance Committee or you, we want X amount of money?
 (11) A: Yes.
 (12) Q: Okay. And the someone they spoke to, was that you
 (13) or was that someone else?
 (14) A: I don't remember any specific conversations. It
 (15) was someone in the organization, probably on the Budget
 (16) Committee.
 (17) Q: What other organizations did the Budget Committee
 (18) decide the funding of other than auxiliaries? Did they
 (19) decide-
 (20) A: None other.
 (21) Q: Okay, just auxiliaries.
 (22) And what was the auxiliary that received the
 (23) highest amount of funding?
 (24) MR. WEINSTEIN: In which year?
 (25) BY MR. SKLAMBERG:

Page 204

(1) Q: In the years that you were at the RNC?
 (2) A: I believe the Young Republicans or the College
 (3) Republicans.
 (4) Q: What was that?
 (5) A: About \$100,000 a year.
 (6) Q: Did any of these groups submit written budgets?
 (7) A: Oh, yeah.
 (8) Q: Okay, but Republicans Abroad, you don't know if-
 (9) A: I don't remember the Republicans Abroad submitting
 (10) one. They could have.
 (11) Q: Okay.
 (12) A: These were all managed out of the office of the
 (13) co-chair. So they may have had a process that they went
 (14) through with the co-chair's office.
 (15) Q: The co-chair at the time that you were at the RNC
 (16) was?
 (17) A: It was Jeannie Austin.
 (18) Q: Jeannie Austin, okay.
 (19) Who headed Republicans Abroad when you were at the
 (20) RNC?
 (21) A: I believe it was Barbara Hayward.
 (22) Q: How was she chosen?
 (23) A: She was there when we got there. She's probably
 (24) still there.
 (25) Q: How were the heads of the auxiliary organizations

Page 205

(1) chosen?
(2) A: They have their own bylaws and rules, and they'd
(3) go through some type of a-I guess an election.
(4) Q: Did the choice have to be ratified by the RNC?
(5) A: No. I believe it was just as long as the rules
(6) and regulations they submitted were followed properly, we
(7) would agree to it.
(8) Q: When you were at the RNC, how often did you speak
(9) with Ms. Hayward?
(10) A: Probably once a year, right before the budget
(11) time.
(12) Q: Did you speak with William Ali Mills?
(13) A: I think I spoke to him once or twice. He was like
(14) her executive director.
(15) Q: So he was the number two at the Republicans
(16) Abroad?
(17) A: Yeah. Well, he was the executive director, yeah.
(18) Q: What did you discuss with them?
(19) A: The only conversation I remember was a question
(20) about trying to raise their budget. They had a bigger
(21) budget request in.
(22) Q: Was their request acceded to?
(23) A: No.
(24) Q: What-
(25) MR. WEINSTEIN: Mr. Sklamberg, I have let you all

Page 206

(1) march into this because I wanted to see if something
(2) developed. My understanding is that the mandate of the
(3) Committee, your legal authority as well as Senator
(4) Thompson's recent order elaborating on your legal authority
(5) do not cover any of the questions that you are asking. So I
(6) will interpose an objection, and I will ask you to ask the
(7) next question, and we will see where we are going from here.
(8) MR. SKLAMBERG: Well, I would ask you-I will ask
(9) some further background questions from Republicans Abroad.
(10) MR. WEINSTEIN: Well, if you want to ask
(11) background, I think that's fine, but I can't tell anything
(12) that deals with the 1996 Federal election campaign, even as
(13) interpreted by Senator Thompson or by the Senate resolution
(14) that authorizes you to legally ask him questions.
(15) MR. SKLAMBERG: I'd ask that you be patient.
(16) MR. WEINSTEIN: Well, I'm not really
(17) necessarily-I think I have been patient for the last 15 or
(18) 20 minutes. I'm going to ask you to show some relevancy or
(19) we're not going to answer any more of these, or I'm going to
(20) recommend that the witness not answer them.
(21) MR. SKLAMBERG: Okay.
(22) BY MR. SKLAMBERG:
(23) Q: In general terms, what were Republicans Abroad's
(24) operations and objectives?
(25) A: In general terms, they were to create enthusiasm

Page 207

(1) for the Republican party.
(2) Q: Did you or anyone in the RNC give advice to
(3) Republicans Abroad or communicate with them about their
(4) activities?
(5) A: I believe the office had a co-chair that
(6) communicated with them regularly.
(7) Q: Did you have any input in that communication?
(8) A: No. It was not a top priority.
(9) Q: I am going to show you a document.
(10) MR. SKLAMBERG: I would like to get this admitted,
(11) please.
(12) [Reed Deposition Exhibit No. 8
(13) marked for identification.]
(14) MR. SHAW: Again, let the record reflect that this
(15) document does not have any Bates numbers, and also, there's
(16) a bunch of notes on it and some redactions.
(17) I'd like to ask Minority counsel, do you know the
(18) source of this document?
(19) MR. SKLAMBERG: I do not.
(20) MS. SHAW: Has this document been produced to the
(21) Majority?
(22) MR. SKLAMBERG: I do not know.
(23) MR. WEINSTEIN: Can I ask a question?
(24) MR. SKLAMBERG: Yes.
(25) MR. WEINSTEIN: This notation or obscuration,

Page 208

(1) whatever you would call it-
(2) MR. SKLAMBERG: Right.
(3) MR. WEINSTEIN: -is that on the original, is that
(4) on your document, or did you all do that?
(5) MR. SKLAMBERG: I do not know.
(6) MR. WEINSTEIN: Well, you just didn't pick this up
(7) when you were trotting it on in here. I mean, was the
(8) document that you originally started with-
(9) MR. SKLAMBERG: Sir, I can only say to you, I do
(10) not know.
(11) MR. WEINSTEIN: Well, who would know?
(12) MR. SKLAMBERG: I can just tell you I did not
(13) know, and I intend to ask questions about the document, and
(14) you can put your comments on the record, which they already
(15) are.
(16) BY MR. SKLAMBERG:
(17) Q: For the record, describe the document. It's a
(18) document on Republican Abroad-Japan stationery dated August
(19) 20, 1995. "Dear Americans and Friends"-and it's-you
(20) read-read the document, Mr. Reed?
(21) MR. WEINSTEIN: No, he doesn't need to read it.
(22) The document-
(23) THE WITNESS: It's dated 1995.
(24) MR. SKLAMBERG: Okay.
(25) MR. WEINSTEIN: The document speaks for itself.

Page 209

(1) BY MR. SKLAMBERG:
(2) Q: I'm going to direct your attention to the last
(3) line of the document. It says Republicans Abroad-Japan
(4) activities are not only open to Americans, but to those of
(5) other nationalities interested in the American political
(6) process.
(7) During your period-well, first of all, do you
(8) have any knowledge of Republicans Abroad's fund-raising
(9) activities?
(10) A: No.
(11) Q: Are you familiar with any activities of
(12) Republicans Abroad-Japan?
(13) A: No. This document is dated 1995. I was long
(14) gone.
(15) Q: I understand.
(16) The document, in the box to the document, there is
(17) an announcement. It says Haley Barbour, chairman of the
(18) RNC, will be in Tokyo, and it goes on to say that you will
(19) be attending a Republican Abroad-Japan event. Are you
(20) familiar with that event?
(21) MR. WEINSTEIN: But he was-
(22) THE WITNESS: No.
(23) MR. WEINSTEIN: He was gone. This was August
(24) 28th-
(25) MR. SKLAMBERG: He's answered the question, Mr.

Page 210

(1) Weinstein.
(2) THE WITNESS: No.
(3) BY MR. SKLAMBERG:
(4) Q: Okay. Are you familiar with any Republicans
(5) Abroad events that Haley Barbour attended?
(6) MR. WEINSTEIN: Wait. Whoa, whoa, whoa. During
(7) what time frame? Because that makes a big difference
(8) whether or not it's within or outside the mandate.
(9) MR. SKLAMBERG: Any time frame.
(10) MR. WEINSTEIN: No, no, no, no. Well, I'm going
(11) to say if the witness-if the witness has knowledge of any
(12) events that Haley Barbour attended pertaining to the 1996
(13) election cycle, then-
(14) MR. SKLAMBERG: All right. I-
(15) MR. WEINSTEIN: -I think that's a fair question.
(16) If it pertains to Haley Barbour attending Republicans Abroad
(17) events in the '93-'94 time period, I'm going to instruct the
(18) witness not to answer that question, as it not being
(19) authorized by law.
(20) MR. SKLAMBERG: Okay. I will ask the following
(21) question.
(22) BY MR. SKLAMBERG:
(23) Q: Are you familiar with any Republicans Abroad
(24) events that Haley Barbour attended in 1995 and 1996?
(25) A: No.

Page 211

(1) Q: Okay. Are you familiar with any events Haley
(2) Barbour attended, Republicans Abroad events, in 1993, 1994?

(3) MR. WEINSTEIN: I'm going to object. That is
(4) clearly outside the scope of your mandate. You are not
(5) legally entitled to answer that question. I am going to
(6) direct the witness not to answer it.

(7) MR. SKLAMBERG: Okay.

(8) BY MR. SKLAMBERG:

(9) Q: Returning again to the body, Republicans Abroad
(10) activity, Japan, not only opened to Americans, but to those
(11) of other nationalities, did you have any discussions with
(12) anyone at the RNC about Republicans Abroad's fund-raising
(13) overseas?

(14) MR. WEINSTEIN: I'm going to object to that
(15) question. I believe he's already answered it.

(16) MR. SKLAMBERG: Well, I'll ask it again.

(17) THE WITNESS: No.

(18) BY MR. SKLAMBERG:

(19) Q: Okay. Was there any protocol or set of rules in
(20) place at the RNC regarding fund-raising activities outside
(21) the United States?

(22) MR. WEINSTEIN: During the 1993-1994 time period?

(23) MR. SKLAMBERG: During any period.

(24) THE WITNESS: The RNC did not get involved in the
(25) fund-raising practices of the auxiliaries.

Page 212

(1) BY MR. SKLAMBERG:

(2) Q: Okay. So none of the auxiliaries, to your
(3) knowledge, ever communicated with the RNC about
(4) fund-raising, received assistant from the RNC with
(5) fund-raising?

(6) A: No. That's not-

(7) MR. WEINSTEIN: That's a different question.

(8) THE WITNESS: That's a totally different question.

(9) MR. SKLAMBERG: Well, assuming-

(10) MR. WEINSTEIN: During what time period?

(11) MR. SKLAMBERG: During any time period.

(12) MR. WEINSTEIN: No, no, no. Well, you
(13) can't-Mr. Sklamberg, if it deals with the '93-'94 time
(14) period, it is outside of your legal authority to ask it. I
(15) think it is-I think there is no reason why you have to
(16) exceed your mandate in this way. It is absolutely illegal.
(17) It is improper.

(18) MR. SKLAMBERG: I disagree wholeheartedly.

(19) MR. WEINSTEIN: Well, it is great that you can
(20) disagree.

(21) Formulate your questions. I will direct the
(22) witness not to answer, and then you can take it up to the
(23) Committee and explain to them.

(24) MR. SKLAMBERG: Absolutely. I will formulate my
(25) questions and-

Page 213

(1) MS. BRIGATI: Can we take a break, Martin?

(2) MR. WEINSTEIN: Yes, that would be fine.

(3) [Recess.]

(4) MR. SKLAMBERG: Can you replay my previous
(5) question?

(6) [The Reporter read back the requested portion of
(7) the record.]

(8) THE WITNESS: The answer is they did communicate
(9) with the RNC about fund-raising through the co-chairman's
(10) office where they were directed to report.

(11) BY MR. SKLAMBERG:

(12) Q: Okay. Were these communications in writing?

(13) A: I don't have any idea, but I know they managed
(14) some

(15) Q: Okay. And were you privy to any of these
(16) communications?

(17) A: The only time I got involved with communications
(18) from the auxiliaries was when they were interested in
(19) budget. The rest, I had nothing to do with.

(20) MR. WEINSTEIN: Are we done with this, sir?

(21) MR. SKLAMBERG: Yes.

(22) I would like to mark this as an exhibit, please.

(23) [Reed Deposition Exhibit No. 9

(24) marked for identification.]

(25) MR. SHAW: Again, I'd like to note for the record

Page 214

(1) that this document does not have a Bates number on it.

(2) Counsel, do you have any idea where this document
(3) came from?

(4) MR. SKLAMBERG: No, I do not.

(5) MR. SHAW: To your knowledge, has this document
(6) been produced to the Majority?

(7) MR. SKLAMBERG: I do not know.

(8) MR. SHAW: Thank you.

(9) MR. SKLAMBERG: For the record, this is a document
(10) that is titled Factual-

(11) MR. WEINSTEIN: Dated?

(12) MR. SKLAMBERG: I believe it's-

(13) MR. SHAW: It's Exhibit 9, right?

(14) MR. SKLAMBERG: Yes.

(15) It does not have a date.

(16) BY MR. SKLAMBERG:

(17) Q: It does, however, on the second page of the
(18) document refer to an event-refer to April 18, 1995. So
(19) that would indicate-

(20) MR. WEINSTEIN: Can I see this, sir?

(21) MR. SKLAMBERG: On the second page of the
(22) document, at the end of paragraph four. That would indicate
(23) the document was written after that date.

(24) BY MR. SKLAMBERG:

(25) Q: Can I turn your attention to paragraph number

Page 215

(1) eight of the document? It is entitled Financial
(2) irregularities. It says financial irregularities are
(3) characteristic of Republicans Abroad.

(4) MR. WEINSTEIN: The document speaks for itself.

(5) MR. SKLAMBERG: Okay.

(6) BY MR. SKLAMBERG:

(7) Q: Did the RNC have any oversight over the
(8) fund-raising activities of Republicans Abroad?

(9) A: No.

(10) Q: Did it have any oversight of the fund-raising
(11) activities of any of its auxiliary organizations?

(12) A: Only if they involved the Republican National
(13) Committee.

(14) Q: Which organizations involved the Republican
(15) National Committee?

(16) A: Well, we may-I believe we lent or we rented one
(17) of our donor lists to the College Republicans or the Young
(18) Republicans at one time. So, for a transaction like that,
(19) we would need to approve the letter that it would go out.
(20) We never did anything like that for the Republicans Abroad
(21) that I'm aware of.

(22) Q: So the oversight of the RNC over auxiliaries
(23) occurred only with regard to events that the RNC paid for?

(24) A: No, not events, but things like renting a list
(25) that we were directly involved in, a fund-raising list.

Page 216

(1) Q: Okay. Did Rep: 'bicans Abroad ever send the RNC
(2) such a list?

(3) A: Not to my knowledge, no.

(4) Q: Did it ever send the RNC a voter registration
(5) list?

(6) A: Not to my knowledge, no.

(7) Q: Are there general-were there, when you were at
(8) the RNC, general procedures in place about audits of
(9) non-auxiliary organizations, say, major donor groups?

(10) MR. WEINSTEIN: Audits in place by whom?

(11) MR. SKLAMBERG: Audits by the RNC of, say, Team
(12) 100

(13) THE WITNESS: No.

(14) BY MR. SKLAMBERG:

(15) Q: Okay.

(16) A: Because you're-no. The answer is no.

(17) MR. WEINSTEIN: Team 100 or-you're talking about
(18) different things.

(19) MR. SKLAMBERG: I know I am.

(20) THE WITNESS: But the answer is no.

(21) BY MR. SKLAMBERG:

(22) Q: Okay. Team 100, the Republican Eagles-

(23) A: No.

(24) Q: -any of those organizations. Okay.

(25) Was there any discussion at the RNC that you're

Page 217

(1) aware of about auditing?
(2) MR. WEINSTEIN: When you say auditing, are you
(3) meaning like Price Waterhouse coming in and doing an audit-
(4) MR. SKLAMBERG: Reviewing-
(5) MR. WEINSTEIN: -or doing-
(6) MR. SKLAMBERG: Reviewing the finances-
(7) THE WITNESS: Of the Republicans Abroad?
(8) MR. SKLAMBERG: -of the auxiliaries.
(9) BY MR. SKLAMBERG:
(10) Q: Republican auxiliaries or Republicans Abroad or
(11) other auxiliaries.
(12) A: Yes.
(13) Q: There were discussions?
(14) A: Yes.
(15) Q: Can you elaborate?
(16) A: We did an audit of the Republicans. I believe it
(17) was the College Republicans-
(18) Q: Okay.
(19) A: -to see where they were spending their money.
(20) Q: And why did you do that audit?
(21) A: Because if I'm not mistaken, they were having
(22) financial difficulties, and for us to help them get on their
(23) feet financially, we wanted to see if they had a plan.
(24) Q: Financial difficulties meaning they didn't-
(25) MR. WEINSTEIN: Can I ask you to explain to me

Page 218

(1) what an audit of the College Republicans in 1993 or 1994 has
(2) to do with the 1996 Federal election campaign?
(3) MR. SKLAMBERG: I view that, sir, as my duty is to
(4) ask the questions.
(5) MR. WEINSTEIN: I recognize you view that as your
(6) duty, but if you-how does this relate to that? I mean, I'm
(7) not quarreling with your duty, but can you not make a
(8) minimal showing?
(9) MR. SKLAMBERG: I am-I am asking why it is you
(10) would audit.
(11) MR. WEINSTEIN: Well, I'm not going to allow him
(12) to answer that question.
(13) MR. SKLAMBERG: Okay.
(14) MR. WEINSTEIN: It has nothing to do with the 1996
(15) cycle.
(16) BY MR. SKLAMBERG:
(17) Q: Why is it that the RNC would audit the Young
(18) Republicans, but not audit the Republicans Abroad?
(19) MR. WEINSTEIN: During what time frame?
(20) BY MR. SKLAMBERG:
(21) Q: During the time frame-any time frame you were
(22) aware of
(23) MR. WEINSTEIN: Okay. Well, if you won't specify
(24) to it-
(25) THE WITNESS: I can only talk about the time frame

Page 219

(1) when I was there.
(2) BY MR. SKLAMBERG:
(3) Q: Okay. Then talk about it.
(4) MR. WEINSTEIN: No. I'm not going to allow him to
(5) answer that question. That's outside the scope of the
(6) mandate. Unless you can make some peripheral showing-
(7) MR. SKLAMBERG: I have here an allegation from a
(8) document dated after 1995 that the Republicans Abroad, which
(9) has the word "abroad in it"-
(10) MR. WEINSTEIN: Yes, I understand that.
(11) MR. SKLAMBERG: -engaged-had poor audits or
(12) superficial and incomplete financial irregularities
(13) MR. WEINSTEIN: I understand, and I see the
(14) document, but if you want to ask somebody what happened
(15) during the 1996 Federal election cycle pertaining to this
(16) document, that is fine.
(17) BY MR. SKLAMBERG:
(18) Q: If a group, an auxiliary group's finances were in
(19) shambles, if their audits are superficial and incomplete,
(20) would the RNC audit that group, review their finances, give
(21) them advice about how to maintain their finances better?
(22) A: That's a hypothetical question. I really don't-
(23) Q: Was that done with the Young Republicans?
(24) A: The fact that it was audited and reviewed?
(25) Q: Yes.

Page 220

(1) A: Yes.
(2) Q: We were discussing before-you said that was done
(3) because they didn't have-they were short of money?
(4) A: They were having cash-I believe they were going
(5) through a leadership change. They needed some help. I
(6) believe we did a letter for them, rented them our list-
(7) Q: Okay.
(8) A: -and helped them get on their feet.
(9) Q: Your list of what?
(10) A: Donors.
(11) Q: Your list of donors, okay.
(12) Did you make your list of donors available to
(13) other auxiliary organizations?
(14) A: No.
(15) Q: I direct your attention to the last page of this
(16) letter.
(17) A: Okay.
(18) Q: Paragraph one-have you read paragraph one?
(19) A: Yes.
(20) Q: Okay. Did the RNC oversee the FEC reports of any
(21) of its auxiliary organizations?
(22) MR. WEINSTEIN: During what period?
(23) BY MR. SKLAMBERG:
(24) Q: During the period that you were at the RNC.
(25) A: I don't remember.

Page 221

(1) Q: Did they ever send those FEC reports to anyone at
(2) the RNC?
(3) MR. WEINSTEIN: Who is they?
(4) BY MR. SKLAMBERG:
(5) Q: The auxiliary organizations.
(6) A: I don't remember.
(7) Q: Did you ever see any of those FEC reports?
(8) MR. WEINSTEIN: From the auxiliary organizations?
(9) BY MR. SKLAMBERG:
(10) Q: From the auxiliary organizations.
(11) A: I think it's safe to say I never saw any of them.
(12) Q: Did the RNC communicate with or have any advice or
(13) protocols or procedures that it gave to auxiliary
(14) organizations regarding FEC contributions and how to report
(15) them?
(16) A: That's a question for the co-chairman's office who
(17) managed the auxiliaries. I don't know.
(18) Q: I would direct your attention to paragraph three,
(19) anonymous foreign bank accounts, monetary transfers between
(20) foreign countries, and reports of money laundering using
(21) Republicans Abroad.
(22) Did the Republican party when you were at the RNC
(23) maintain foreign bank accounts?
(24) A: No.
(25) Q: Did any Republican auxiliaries maintain any

Page 222

(1) foreign bank accounts?
(2) MR. WEINSTEIN: If you know.
(3) THE WITNESS: I don't have a clue.
(4) BY MR. SKLAMBERG:
(5) Q: Okay. Let's see. Do you know Charlotte Kennedy
(6) Takahashi?
(7) A: Never heard of her, never met her.
(8) Q: Do you know Joan Shepherd?
(9) A: Never heard of her, never met her.
(10) Q: And Barbara Hayward, you said you have met?
(11) A: Met a couple of times, yeah.
(12) Q: You spoke with her-
(13) A: Once or twice.
(14) Q: -once or twice. And about?
(15) A: As I said before, about the budget.
(16) Q: Did you ever discuss with her the operations of
(17) the Republicans Abroad?
(18) A: No.
(19) Q: Now, Republicans Abroad, to your knowledge, did it
(20) engage in voter registration of Americans living abroad?
(21) A: No. I believe it engaged in voter absentee ballot
(22) programs. I think that was the thrust of what it did.
(23) Q: Did the RNC offer any advice, communicate with,
(24) have any input on those programs, communicate with the-
(25) A: Not that I'm aware of.

Page 223

[1] Q: -Republicans Abroad?

[2] Did Republicans Abroad engage in any polling, to
[3] your knowledge?

[4] A: Not that I'm aware of, no.

[5] Q: Did it engage in any--did it run any commercials?

[6] A: I have nothing to do with what it did. So I don't
[7] know.

[8] Q: Okay, fair enough.

[9] MR. SKLAMBERG: Actually, I believe that concludes
[10] my questions.

[11] MR. SHAW: Mr. Reed, I apologize. I do have a few
[12] quick questions and one instruction I would like to make to
[13] the court reporter.

[14] I would like, if possible, if you could have each
[15] document that was introduced at this deposition today,
[16] without the letter prefix of "R," certified where it has
[17] been entered in the deposition, and in addition to the
[18] documents that have--and that includes documents that do not
[19] have any Bates number on them.

[20] There are a few questions that we have about these
[21] documents, the Majority has about these documents, which is
[22] where do they come from, who produced them, and why they
[23] were introduced in a deposition today without any prior
[24] notice to the Majority because some of these documents were
[25] obviously not produced to the Majority. That's first.

Page 224

[1] That's sort of a housekeeping matter.

[2] Second, before I get to my question, I would like
[3] to thank Mr. Reed for coming in today, giving his deposition
[4] under oath voluntarily, and I am happy for his patience with
[5] being asked the same questions over and over again at many
[6] points in this deposition.

[7] EXAMINATION BY COUNSEL FOR THE MAJORITY
[8] COMMITTEE ON GOVERNMENTAL AFFAIRS
[9] BY MR. SHAW:

[10] Q: Now, getting to my questions. I have one broad
[11] question that I think is of interest to everybody involved
[12] with this investigation, the Majority and Minority, and it
[13] is a very basic question, and that is, when you were
[14] executive director of the Republican party, to the best of
[15] your knowledge, was the RNC, that is, the Republican
[16] National Committee, and the National Policy Forum, the
[17] NPF--are they separate organizations?

[18] A: They were.

[19] Q: What makes you sure of that?

[20] A: Because we took the legal precautions to make sure
[21] they were set up as separate organizations and managed as
[22] separate organizations.

[23] Q: At any time, to your knowledge, when you were
[24] executive director of the Republican National Committee, did
[25] the RNC ever solicit money from foreign sources?

Page 225

[1] A: Not to my knowledge, no.

[2] MR. SKLAMBERG: Define foreign.

[3] MR. SHAW: Foreign meaning with companies or
[4] citizens that are not--not United States citizens or United
[5] States-owned. There are a few legal points here and there
[6] with subsidiaries, but I am not going to get into that right
[7] now.

[8] That is all I am going to have for you today, Mr
[9] Reed. Thank you very much for coming in, and I will turn it
[10] back over to Mr. Sklamberg.

[11] MR. SKLAMBERG: Okay. I have no further
[12] questions.

[13] MR. SHAW: Thank you.

[14] [Whereupon, at 2:58 p.m., the taking of the
[15] deposition was adjourned.]

[16] [Signature Not Waived.]

\$
\$1 111:16, 24; 115:10;
126:3; 129:2
\$100,000 204:5
\$2 123:12
\$25,000 201:20, 21
\$350,000 115:11

O
014591 118:4; 119:23;
120:3; 122:16
015329 144:19
015332 144:19; 146:4
021495 136:7
021497 136:7

1
1 8:13; 37:20, 20; 38:12,
14, 15; 39:5; 40:10, 18, 18,
24; 41:21; 42:9, 15, 19, 21,
25; 43:18; 47:24; 87:13,
17, 21; 150:19, 24; 152:1
10 190:25
10-page 149:25; 150:6
100 54:6; 216:12, 17, 22
100-percent 80:14; 85:7;
89:20
10:30 79:2
12 172:11; 180:1; 184:20;
185:8, 9, 18, 19
12-month 185:13
12:15 186:16
12:28 166:4
15 172:11; 180:1; 184:20;
185:8, 9, 18, 19; 206:17
17 118:1
18 184:16, 214:18
1978 6:8
1982 6:6
1983 6:24; 7:4, 8
1984 7:9
1985 7:18
1986 7:18, 18
1987 7:20
1988 7:21, 24
1992 8:2
1993 8:7, 11; 24:18; 45:3;
83:18; 98:25; 150:7, 18,
19; 151:25; 152:1, 6;
159:15; 162:11, 12, 16;
185:21; 186:15; 211:2;
218:1
1993-1994 211:22
1993-94 148:6; 161:21
1994 83:18; 98:25;
102:10; 105:14; 106:17;
107:11; 108:5, 17; 109:2,
13; 116:2, 21; 123:11;
125:23; 127:18; 167:16;

168:5; 178:17, 20; 211:2;
218:1
1995 8:14; 208:19, 23;
209:13; 210:24; 214:18;
219:8
1996 118:1; 206:12;
210:12, 24; 218:2, 14;
219:15
1997 37:20, 20; 38:12, 15,
15; 39:5; 40:10, 18, 18, 24;
41:22; 42:10, 16, 19, 22,
25; 43:19; 47:24
1:30 166:5
1:41 167:2
1st 37:16; 38:13, 22, 23

2
2 117:22, 25; 123:3, 5, 6,
6, 10; 150:7, 18, 24;
151:25; 152:6; 170:17
2-year 180:2
20 206:18; 208:19
25 202:3
28 167:16; 168:5; 185:20;
186:15
28th 209:24
2:00 56:1

3
3 135:24, 25; 136:3; 138:6
35 111:11; 113:5, 17, 19;
115:6, 10

4
4 74:20; 144:21; 187:21,
22; 193:4
4:30 191:14, 21

5
5 149:19; 152:4
501(c)3 74:19; 160:7
501(c)4 175:22; 181:6

6
6 167:16, 19; 168:1
60 123:15
65 113:5; 115:13
65-35 113:18

7
7 185:24
79 88:6

8
8 190:25; 207:12
82 6:17
84 7:14
863-8773 187:4

9
9 213:23; 214:13
92 120:3
93 85:1, 10, 15; 97:5, 13;
98:16; 120:3; 134:17;
141:9; 143:24; 184:11;
185:3, 4, 11; 187:2, 11
93-'94 210:17; 212:13
94 85:10, 15; 88:2; 97:5,
13; 98:16; 102:7; 105:7;
106:14, 21; 125:24;
127:19; 134:17, 19; 137:9;
141:9; 164:1; 184:12;
185:5, 11; 187:2, 11
95 83:21; 85:1, 10, 16;
134:17, 18; 185:1; 198:2, 4
96 83:23; 198:2, 4

A
a-I 205:3
a-okay 107:4
a-on 6:15
a.m 56:1
ability 14:8
able 83:1; 103:5
about--let's 169:11
about--you 91:2
abroad 77:21; 200:15,
18, 19; 201:7; 204:8, 9, 19;
205:16; 206:9; 207:3;
210:5, 16, 23; 211:2, 9;
215:3, 8, 20; 216:1; 217:7,
10; 218:18; 219:8, 9;
221:21, 222:17, 19, 20;
223:1, 2
Abroad's 206:23; 209:8;
211:12
Abroad-Japan 208:18;
209:3, 12, 19
absentee 222:21
Absolutely 6:1, 11:18;
18:14, 22:7, 29:18; 31:19;
120:1; 122:21; 193:1;
212:16, 24
abuse 177:9
abusive 177:7
acceded 205:22
accept 74:20, 25; 75:1;
136:18; 156:15, 20; 160:2,
3, 7, 9
accomplish 153:20
accomplished 70:1;
172:23
accordance 115:23

according 168:23; 185:1
account 112:6, 7, 9, 10,
12, 14, 23; 113:4, 5, 6, 9, 9,
9; 114:5, 11; 115:7, 21, 25;
116:10; 117:4
accountants 114:2
accounting 61:1, 5;
66:11
accounts 221:19, 23;
222:1
acronym 112:20
across 51:8
action 189:14
actively 105:2
activities 9:2; 16:3;
75:16; 76:7, 16; 81:8;
91:25; 92:13; 93:2;
112:25; 113:22; 201:16;
207:4; 209:4, 9, 11;
211:20; 215:8, 11
activity 102:18, 19;
211:10
actual 20:24; 28:16;
86:14; 87:15, 18
actually 21:21; 35:1;
36:3; 52:10; 87:21; 104:5,
11; 143:6; 176:2; 178:1;
183:11; 193:20; 223:9
actually--well 21:15
acute 110:10
ad 133:17
addendum 147:4
addition 98:18; 113:19;
130:23; 159:13; 193:2;
223:17
additional 53:21; 61:23;
148:1; 189:9
address 132:17
address--I 16:25
addressed 71:22;
152:15; 153:1, 4; 160:22
administer 192:10
administration 14:11;
42:4; 52:17; 66:8; 192:11,
12
administrative 51:7
admissions 36:4
admit 113:9
admitted 207:10
advertently 60:19
advertising 110:7;
182:20
advice 75:15; 88:18, 21;
207:2; 219:21; 221:12;
222:23
advise 49:19; 163:12, 15,
21; 177:3, 18
advised 159:5
advisor 160:22; 163:4;
177:1
advisors 153:10
Affairs 4:5, 8; 119:11, 12;
120:9; 122:1; 167:13;
224:8
affect 113:25

AFTERNOON 167:1
afterwards 57:13
again 9:13; 10:4; 26:18;
39:6; 98:23; 103:22;
112:17; 124:23; 132:21;
159:4; 168:9; 177:11;
193:24; 207:14; 211:9, 16;
213:25; 224:5
agenda 60:21; 69:19;
70:2; 92:4; 152:14
agendas 69:13, 14, 17,
18, 20; 70:9
aggressive 132:18
ago 28:9; 36:13; 37:9, 10;
38:6; 44:7, 16; 48:17; 77:4;
124:8; 140:24; 179:24
agree 50:25; 56:4; 65:18;
83:9; 84:5, 18; 96:5;
101:21; 109:7; 114:4;
115:21; 122:9, 13, 15, 19,
21; 150:21; 205:7
agreed 200:8, 9
agreement 55:8, 16;
119:22; 122:22; 147:5
ahead 33:15; 53:19;
74:14, 14; 86:18; 138:10;
191:18; 197:2
aid 115:7
aide 47:16
aided 65:20, 22
aim 139:9
airplane 41:5, 7
Al 187:12; 202:21
Albert 14:10
Ali 205:12
all--have 118:25
allegation 219:7
Allison 15:16, 17; 34:11,
12, 14; 36:1, 10; 38:3, 5, 9,
21; 57:25
allocated 128:17
allow 125:4; 218:11;
219:4
allows 201:15
along 194:19
already 37:22; 52:1;
98:19; 124:18, 21; 158:20;
169:22; 170:18; 189:3, 8;
193:19; 196:17; 208:14;
211:15
although 55:20
altogether 125:7; 199:1
always 50:21; 107:4;
116:11; 136:12, 13;
165:10; 189:17
am--I 218:9
ambit 55:1
Ambrous 123:16
America 88:9, 10, 14;
89:1, 13; 90:6, 11; 136:25;
137:5; 138:1, 24; 139:4, 6,
16; 140:19, 23; 142:2, 6, 9,
10, 11; 183:1
America"--I 138:7
American 72:11, 25;

73:7, 8; 74:3; 75:6; 78:16;
17, 18, 20; 96:21; 194:12;
23; 155:18; 156:17, 21;
158:23; 160:11; 161:18;
21; 162:2, 6, 13, 18; 209:5
Americans 82:24;
208:19; 209:4; 211:10;
222:20
Among 82:8; 181:5
amount 54:1, 4; 95:23;
108:12; 111:24; 115:11;
116:25; 203:10, 23
analysis 58:10
announced 194:17, 20,
24
announcement 154:2;
195:3, 5, 5; 209:17
annual 201:14
anonymous 221:19
answer—the 125:11
answered 37:22; 38:19;
47:20; 94:5, 25; 125:4;
130:1; 155:21; 156:3, 7,
23, 24; 159:1; 169:5;
173:4; 178:5; 189:3;
193:19; 209:25; 211:15
answering 57:5; 121:11
any—did 125:13; 223:5
any—there 144:11
anybody 12:21; 13:7;
15:14; 16:25; 19:11;
28:11, 11, 19; 33:17; 34:3;
6; 39:19, 23; 45:18, 21;
59:20; 60:25; 63:8; 72:14;
77:20, 24; 80:10, 19; 82:2;
90:5, 10; 93:14, 17, 24;
94:1; 95:23; 96:12, 14, 17;
97:21; 98:16, 24; 100:11,
23, 107:10, 15; 114:3;
119, 16; 129:8, 131:15;
135:8, 12; 148:20; 157:8,
12, 16, 158, 1, 4; 159:5,
160:15, 20; 165:4; 170:2,
5, 12, 12, 174:9, 18,
175:13, 181:19, 23, 25,
189:1, 10, 192:17, 194:1,
195:25, 196:20, 21, 198:3
anybody's 146:7
anyone 207:2, 211:12,
221:1
anyplace 28:14, 164:6
Apert 34:12, 63:14,
64:19, 92:10, 106:7
apologize 223:11
appear 120:8, 122:22,
199:10, 17, 200:2
appeared 12:13, 143:12
appearing 5:19, 109:21
appears 123:7, 145:22;
153:24
applicable 162:23
application 181:6
applied 94:10; 95:25
apply 122:5
appraised 108:12
appreciate 10:17; 95:18;

103:16; 104:12; 152:22;
176:20
apprised 107:5; 128:1
approach 153:22
approached 99:23, 23;
154:1, 1; 194:14, 15
approaching 188:5
appropriate 29:15;
35:14; 56:24; 74:9; 94:24
appropriately 128:17
approval 21:12; 62:9
approvals 87:6
approve 62:25; 63:10;
215:19
approved 21:4, 5, 7;
50:17; 63:17; 183:10;
202:9
approving 85:14
approximately 19:17;
70:6; 125:25; 180:3;
186:16
April 194:25; 214:18
are—let 167:23
are—were 186:14
area 55:25; 114:18, 21;
190:21, 21; 198:13
argue 30:15
arm 22:21; 23:6, 8, 11, 13
arms 15:10
arose 17:12
Around 71:1; 82:23;
88:2; 89:15; 160:14;
172:2; 173:8; 175:7;
180:22; 185:1; 196:16
arrange 126:25
arrived 24:17; 51:24;
202:6
articulate 82:18; 83:1,
180:4
articulated 23:11, 16
articulating 81:19
ascertain 53:5, 7
ashamed 113:8
Ashley 138:5; 142:14
Asia 135:5
aside 33:23; 52:9; 157:11
ask—did 61:13
ask—he 199:11
asking—forget 140:10
asking—or 177:5
aspect 30:14; 176:22;
178:3; 179:20; 180:5
aspects 18:3, 13
assert 35:11
asserted 123:21
assertions 136:19
assist 83:6, 7; 90:16, 17,
114:6; 115:14; 123:13;
159:16; 165:4
assistance 123:17;
174:3
assistant 6:22; 8:1; 42:7;
47:16; 174:5; 212:4

assistants 47:10
associates 28:25
assume 54:14; 130:11;
186:10
assume—I 186:10
assumes 17:13; 169:3
assuming 212:9
attached 150:14
attend 67:17; 69:5;
195:21; 201:13
attended 6:7; 80:25;
173:3; 210:5, 12, 24; 211:2
attending 209:19; 210:16
attention 73:4, 5; 78:3;
152:3; 157:21; 158:7;
209:2; 214:25; 220:15;
221:18
attorney-client 35:3;
36:2; 37:1, 5
audit 217:3, 16, 20;
218:1, 10, 17, 18; 219:20
audited 219:24
auditing 217:1, 2
audits 216:8, 10, 11;
219:11, 19
August 127:19; 208:18;
209:23
auspices 91:20
Austin 13:19; 14:20;
204:17, 18
author 168:23
authority 31:8, 13; 56:19,
25, 206:3, 4, 212:14
authorized 145:20;
210:19
authorizes 206:14
automatically 136:19
auxiliaries 203:18, 21;
211:25, 212:2; 213:18;
215:22; 217:8, 10, 11;
221:17, 25
auxiliary 209:20, 24;
201:1, 11; 210:20; 203:22;
204:25, 21; 211:219:18;
220:13, 21, 221:5, 8, 10,
13
available 90:11, 109:8,
19, 19, 110:9, 117:5;
119:19, 128:19, 144:2, 5,
172:3, 197:16, 220:12
aware 24:22, 23; 45:22,
59:22, 69:12, 80:22;
83:20, 86:13, 91:25,
106:13, 16, 107:18,
119:14, 134:6, 12, 15, 16;
135:10, 160:23, 196:1, 20;
215:21, 217:1, 218:22,
222:25, 233:4
away 22:25, 147:2

B

B 84:22
B-e-r-t-o-c-c-o 14:9
B.S 181:13

back 7:4; 9:14, 15, 10:5;
22:22; 23:17; 26:8; 58:15;
86:2; 96:6; 97:2, 4; 98:7;
104:21; 106:5, 6, 15, 18,
21; 107:11; 108:21; 110:2,
3; 112:1, 3; 113:11; 115:1;
117:9, 9; 125:19; 126:1, 4,
5; 129:3, 6; 131:2, 8, 17;
132:19; 149:9, 13; 154:9;
190:25; 213:6
background 5:13; 6:5;
7:5, 6; 206:9, 11
badgering 156:8; 177:7
bailed 149:4
bailing 149:6
balance 86:14; 116:23
ball-park 199:22
ballot 222:21
bank 221:19, 23; 222:1
Banning 14:11; 41:21;
42:2; 51:7; 52:16; 58:25;
63:12; 66:7; 68:9; 165:5;
192:5, 7
Banning's 64:7; 67:6;
192:17
Banning—what 66:6
bar 55:14
Barbara 47:19; 48:7, 8, 9,
10; 182:8; 204:21; 222:10
Barbara's 47:19
Barbour 8:20; 11:6;
12:16; 19:24; 20:3, 5;
22:18; 23:2, 3, 4; 24:9;
25:4, 6, 7, 7; 26:16; 27:10,
12; 42:9, 15; 45:23; 49:23;
51:2; 63:17; 64:3, 4; 77:9;
79:21; 80:15, 16; 82:17;
89:21; 99:15; 108:18, 20;
110:13; 111:4; 116:20;
124:15; 125:14, 18;
127:16; 128:6; 129:9;
131:14; 134:15, 17;
143:21; 147:16; 150:8;
152:5; 153:6, 12; 161:10;
163:25; 169:2, 16, 21;
173:24; 174:10, 19; 180:8;
182:2; 187:6, 9, 10, 10;
195:13; 196:13, 14;
209:17; 210:5, 12, 16, 24;
211:2
Barbour's 21:25; 71:10;
168:24
Baroody 42:18; 51:11;
52:24; 58:18; 67:18, 20;
68:19; 71:9, 21; 80:12, 24;
82:1, 9; 92:8; 143:12;
147:25; 150:8; 152:5;
160:24; 161:1, 6; 167:17;
169:24; 170:21; 171:11,
13, 14, 17; 172:8, 12, 13;
173:19, 20; 174:10, 18, 21,
22; 175:3, 14; 180:10;
181:2; 184:15, 25; 185:12,
17; 196:15, 16; 197:5, 6
Baroody's 81:8, 21;
146:11
Barron 138:5; 142:14
Based 53:17; 94:5

basic 153:21, 22, 23;
197:15; 224:13
basically 16:14; 17:5,
124:22; 199:15
basis 49:24; 50:8; 107:7;
108:13; 156:6
Bates 117:20; 118:4, 17;
119:22; 122:9; 136:7, 8;
144:18; 149:23; 151:8;
168:13; 186:3; 207:15;
214:1; 223:19
Bates-stamped 88:6
beagles 133:7, 15
bears 150:18
beauty 114:14
became 24:10, 13; 47:18;
179:4
because—okay 109:7
Becker 42:21, 23
become 21:25; 22:18;
23:19; 73:18; 175:24;
178:18
becomes 110:10
before—you 220:2
began 12:24
begin 198:15
beginning 17:7, 8, 9, 9,
11; 81:15; 153:22; 171:21;
194:13
begins 170:20; 182:16
begun 49:9
behalf 5:5, 9; 12:7; 47:5;
77:6; 145:7, 14, 20, 23;
146:14; 147:3; 195:12
belief 22:25; 143:2;
168:24
believe 25:9; 31:25;
34:22; 35:8; 38:10; 41:10,
12; 43:5; 45:12, 16; 52:2;
53:24; 54:5, 6; 58:19;
59:18; 60:6, 14; 68:24;
71:1, 21; 72:16; 77:2, 78:2;
81:20; 82:2, 6; 83:11; 84:4;
85:5, 17; 86:18; 88:15;
92:4; 99:22; 101:5;
112:16, 20; 113:4, 17;
120:6; 126:2; 128:5;
133:1, 18; 134:19, 21;
135:7, 21; 138:9; 139:3;
143:1, 12; 148:15; 150:19;
152:13; 153:2, 19; 154:19;
155:1, 16; 159:1; 165:20;
169:4; 175:13; 178:10;
183:3, 5, 6; 187:22;
190:22; 192:9; 194:17, 24,
25; 197:5; 200:19; 201:13,
15, 20; 202:3, 18, 21;
204:2, 21; 205:5; 207:5;
211:15; 214:12; 215:16;
217:16; 220:4, 6; 222:21;
223:9
believed 23:23
believed—I 78:22
belong 150:24
benefit 77:10; 94:12, 21;
114:7, 10; 116:2
Benton 42:21, 23

Bertocchie 14:6
besides 24:23; 79:6;
88:18; 90:1; 182:6; 201:16
best 14:8; 63:4; 118:8;
145:3; 224:14
Beth 48:13
better 83:1; 89:13;
161:19; 219:21
between-when 91:3
beyond 78:9; 108:11;
132:3
big 70:14; 145:15;
175:11; 210:7
bigger 205:20
biggest 103:4
Bill 41:8
bit 10:8; 25:11; 98:5;
107:24; 121:4; 154:10
Blalock 39:15; 40:19;
47:16
Blalock-John 42:25
blue 136:2
board 41:10; 12; 82:20;
195:1
Bob 8:15
body 23:9; 86:23; 211:9
Bolton 42:25
book 88:15; 89:5; 16;
173:11
booklet 142:7
boss 10:13
both 96:19; 142:10;
153:13; 165:9; 175:18;
181:11
bounce 147:22
box 209:16
boxes 55:24; 119:23; 23;
120:20; 190:24
Braden 43:2
break 117:12; 126:7;
213:1
Bridgeport 7:1, 7
brief 5:12; 6:4; 126:8
briefing 110:18
briefly 6:19; 14:19
Brigati 15:17; 33:24;
48:13; 213:1
Brigati-were 15:25
bring 35:13
brings 30:9
broad 224:10
Brock 41:7, 8
Brock's 41:9
broken 114:3
Brothers 101:1, 3, 7;
102:11; 24; 106:8; 111:16;
135:20; 197:19
brought 72:3; 73:4, 5;
75:4; 78:2; 92:21; 157:20;
158:7
Brown 43:4, 5
budget 85:2; 195:19;
197:8, 9; 202:7, 8, 9, 9,

13; 203:2, 3, 5, 15, 17;
205:10, 20, 21; 213:19;
222:15
budgets 204:6
building 67:15; 88:20;
91:4; 112:25; 113:22;
137:18
built 116:1; 197:17
bulk 85:5
bunch 32:9; 135:1;
207:16
buried 150:4
burning 61:6
Burton 120:17
Bush 7:11
business 22:14; 23; 23:5;
17; 28:24; 32:24, 25;
44:16; 148:17; 153:23;
164:8, 15; 199:12
busy 127:11; 134:19
bylaws 205:2

C

c(4) 160:8
calendar 98:25; 185:11;
12; 199:1
call 23:13; 33:2, 4; 51:5;
7, 9, 15; 58:17; 64:11;
66:10; 70:2; 208:1
called 4:4; 25:6; 41:23;
88:14; 112:15; 139:3, 13;
140:18; 22; 141:4; 142:5;
171:15; 184:13; 199:9;
201:7
calling 155:21; 194:18
calls 32:7, 73:10; 116:4;
156:4
Came 6:10, 7, 11; 18:25;
19:4; 21:13; 22:12; 45:16;
51:1, 77:16; 89:19; 91:20;
97:18; 103:24; 104:16;
105:5, 9, 14; 106:2; 112:3;
14; 113:11; 119:15; 133:2;
5, 6; 145:3; 173:15, 17;
179:22; 186:7, 9, 214:3
campaign 6:15, 7, 9, 11;
12, 13, 20; 8:15; 23:19;
24:24; 26:17; 27:21;
65:25; 83:24; 94:9;
105:10, 13; 113:8, 114:18;
117:10; 127:20; 206:12;
218:2
campaigning 22:18
campaigns 85:8, 110:14;
15
can 5:14; 10:7, 16, 11; 22;
12:1; 16:24; 18:20, 22;
29:9; 30:16; 22; 31:17, 20;
32:10, 15; 33:14; 34:18;
35:13; 54:3, 12; 55:20;
57:9; 58:2; 59:7; 60:16;
62:4; 63:13; 65:18; 71:8;
73:17; 78:8; 84:1, 18; 87:5;
21; 92:15; 94:14; 96:5;
97:1; 99:25, 25; 101:21;

105:22; 107:23; 108:10;
109:7, 25; 112:22, 23;
113:12, 14, 15, 20, 21;
114:7; 115:7, 15, 16, 21;
24; 116:10; 118:9; 120:22;
122:15; 123:1; 127:12;
138:21; 139:7, 8, 20;
143:1; 155:7; 156:11;
161:19; 163:6; 164:3;
168:4; 169:23; 170:6, 7, 8;
11; 172:7; 173:5; 174:20;
175:15; 177:10, 12; 180:3;
186:10; 189:5; 191:21;
198:9; 199:4, 21; 201:11;
207:23; 208:9, 12, 14;
212:19, 22; 213:1, 4;
214:20, 25; 217:15, 25;
218:7, 25; 219:6
can't-Mr 212:13
can-how 73:15
cancel 181:8
candidate 5:10; 23:3, 4;
113:3, 25
candidates 14:25; 16:10;
46:15; 90:11, 16, 18;
102:15, 21; 103:8; 104:24;
105:3, 16; 109:9, 20;
113:12, 20; 114:6; 115:4;
14, 17, 23; 116:3
candidates-let's 115:8
capacity 6:13, 21; 9:22;
24, 24; 11:12; 12:15;
46:22; 66:4; 68:2, 6, 14;
153:6, 13, 13; 161:20
capacity-he 32:16
Capitol 6:10
card 133:22
Cardinals 75:19, 21
cards 132:15, 23; 134:4
care 171:15; 182:19
cures 140:9
Carl 13:22
case 69:15; 84:4; 85:1;
120:19; 154:10, 13; 165:9;
11
cash 62:6; 87:6, 154:8;
197:15, 17
cash-I 220:4
casualty 42:12
cause 138:12; 155:3
ceased 178:21
ceasing 179:2
central 102:20; 190:21
ceratin 93:20
certain 4:15; 53:15;
120:5, 12; 25; 128:2;
144:14; 149:1, 2; 158:2;
183:12, 200:8
Certainly 35:18; 55:3, 14;
21, 56:7; 119:9
certified 223:16
chain 196:18
chair-the 12:13
chaired 82:23; 175:18;
202:20
chairman 6:22; 7:3; 8:12;

9:9; 10:9, 10, 11, 12, 23;
11:5, 12, 21, 23; 12:2, 5, 6;
9, 13, 16; 13:8; 21:25, 25;
22:15, 19; 23:2, 19; 24:1;
10; 27:14; 46:10, 13, 19;
22, 25; 47:6; 49:19, 19;
58:24; 60:18; 62:13, 23;
63:9; 64:23; 65:9, 9, 19;
25; 69:4, 9, 25; 70:18;
71:10, 20; 72:4; 78:12;
79:20, 21; 80:15, 16, 19;
23; 81:21, 25; 82:9, 17;
84:11, 21; 88:19, 25;
89:11; 99:5, 8, 14, 15;
107:16; 108:6; 109:10;
128:21; 129:1; 131:13;
134:21; 143:20; 147:21;
152:15, 16, 24; 153:1, 6, 7;
156:14; 157:11; 158:11;
160:23; 161:3; 163:4, 12;
16, 21; 167:17, 18; 168:23;
169:2, 16, 20; 171:13, 14;
173:18; 176:15; 177:1, 18;
178:10; 180:8, 8, 19;
181:2; 182:4; 183:13;
189:21; 192:5; 194:3, 7;
22; 195:11, 12; 202:22;
209:17
chairman's 19:5; 47:13;
51:22; 65:22; 69:3; 71:7;
180:14; 195:20
chairman-that 125:18
chairman 13:18
chance 87:22
change 220:5
changes 5:24; 141:6
channel 145:2, 3
characteristic 215:3
charged 4:14; 103:7
Charlotte 222:5
check 59:1; 79:10; 114:2;
120:20; 143:13
check-off 16:11, 13
checkout 66:23
checks 132:19
Chemical 49:5
Chesapeake 8:17
chief 8:1; 9:1, 3; 16:4;
20:14; 26:22; 53:12;
134:8; 153:10; 183:13, 14;
22; 184:8, 11, 13; 202:16
choice 205:4
chosen 204:22; 205:1
Chris 48:16
Chuck 14:1; 143:16, 17
circulated 25:5; 26:16
circumstance 74:9
circumstances 26:14;
27:2; 36:4
citizen 101:12; 133:23;
134:2
citizens 72:17; 74:25;
75:2; 100:24
clarification 136:17;
151:6
clarify 17:25; 139:8;

176:19
clear 5:18; 11:18; 92:16;
94:18; 97:13; 103:18, 18;
114:16, 18; 123:23;
138:22; 149:14; 151:24;
154:25; 158:14; 176:13;
189:2; 198:19; 200:1
clearly 29:8; 30:9; 31:12;
118:16; 121:5; 211:4
clerical 122:18
client 33:2, 3
Clients 29:3; 32:4, 16, 19,
20; 199:21
close 84:5; 197:7
closely 181:18
closer 84:20
club 70:14, 14, 15; 200:20
clue 141:6; 150:22;
187:16; 192:15; 222:3
co 13:17
co-chair 204:13, 15;
207:5
co-chair's 204:14
co-chairman 13:16, 17;
14:20; 48:8
co-chairman's 48:12;
213:9; 221:16
co-chairmen 82:21, 23;
177:21
co-counsel 35:4, 6
Code 175:22
colleagues 145:2
college 6:9; 201:6; 204:2;
215:17; 217:17; 218:1
colloquy 123:8
combination 109:21
comeback 105:25
comfortable 58:1; 125:8
coming 16:19; 39:16;
97:19; 107:19; 125:19;
126:1, 4, 5; 127:6; 129:3;
6; 131:1, 8, 16; 144:16;
159:8, 12; 217:3; 224:3
command 196:18
command 37:8
commencement 37:13
commenting 58:9
comments 178:23;
180:11; 208:14
commercially 143:3
commercials 223:5
commitments 50:23;
199:21
committed 64:23
Committee 4:4, 8, 14;
5:6; 6:20; 7:19; 8:8, 9, 10,
14; 9:2, 7, 9, 10; 10:10, 17,
24; 11:5, 16; 12:20, 22;
13:1, 3, 12; 14:21; 15:1, 7,
11; 16:15; 19:23; 20:14;
15, 19; 21:11; 22:19, 20;
23:5, 12, 14; 26:2; 27:1;
34:7; 35:13; 40:9; 42:1;
43:9; 46:9, 11, 13, 23;
47:7; 49:17; 50:3; 54:18,

19:55:11; 56:5; 59:12;
60:7; 66:1, 15; 67:11; 69:5;
72:20; 81:13, 14; 84:2, 3,
6, 10, 12, 22; 85:12; 90:3;
91:22, 25; 92:2, 6, 7, 12;
93:2, 17, 19; 95:25; 96:2,
13, 15, 18; 97:21; 103:5;
105:1; 112:12, 20; 118:9,
20; 119:10, 12; 120:9;
121:23; 122:1, 3, 4, 8, 17;
128:22; 130:9; 131:3, 14,
18; 132:7; 135:15; 141:10,
12, 14, 18; 142:4; 144:24,
25; 145:4, 8, 19, 21, 24;
146:15, 18; 147:4, 6;
151:14; 156:12; 160:6;
167:13; 187:14; 199:3, 10;
200:3; 201:3, 4, 14; 202:9,
9, 13, 25; 203:1, 2, 3, 10,
16, 17; 206:3; 212:23;
215:13, 15; 224:8, 16, 24
committee's 30:10, 11;
31:2, 8, 13; 55:5; 56:19;
104:18
committees 15:8
common 90:13, 15
common-sense 73:4
communicate 76:22, 25;
207:3; 213:8; 221:12;
222:23, 24
communicate-1 64:2
communicated 181:11;
182:11; 207:6; 212:3
communication 38:15;
60:15; 78:7; 98:15, 24;
100:23; 101:6; 107:10;
125:13; 129:8, 12; 131:15;
135:16, 19; 144:1, 4;
157:8; 163:25; 197:24;
207:7
communications 13:20,
24; 15:5, 6; 17:2; 33:11;
35:7; 36:9; 107:13, 135:8;
143:16; 182:1; 188:25,
189:1, 10; 213:12, 16, 17
communiqué 93:6
companies 72:1; 74:22;
75:6; 160:9; 161:15;
162:2, 6
company 8:18, 99:22;
101:5; 154:17; 158:8
comparison 136:11
competent 183:8
complete 57:19; 58:10;
111:14; 198:17
compliance 16:4; 57:18
complicated 12:8
complying 162:22
computer 52:9; 54:22,
24; 55:7, 13, 20; 56:8;
57:3, 19; 70:12, 13; 88:8
computer-generated
54:24
computers 54:11
concern 102:20; 121:1,
21; 179:1; 182:18; 183:20
concern-1 31:24

concerned 17:11; 17:17
concerning 123:18
concerns 31:25; 121:20;
181:11; 182:11
conciliatory 73:19
concludes 223:9
conclusion 73:11; 94:6,
24; 103:15; 116:5; 155:21;
179:22
condition 198:16
conditions 192:21, 24
conducted 57:2
confer 31:17
conference 194:25;
195:2
confess 186:12
confidentiality 122:5
confirm 27:9; 41:24;
118:9, 11
confuse 139:9; 155:2
confused 115:19; 138:20
confusing 25:19; 139:5,
21
confusion 139:9
Congress 102:15;
113:13, 20; 114:7; 115:23;
130:10
congressional 115:8;
127:20; 129:20, 23;
174:24, 25; 175:1
Congressman 6:12
connect 144:11
connected 23:22
Connecticut 7:2, 8
connection 5:5, 8, 23:6;
59:24; 76:6; 144:12;
165:12
considerable 116:25,
168:24; 169:16, 19
Consisting 66:17, 18,
151:20
constant 109:9; 110:25;
111:3
constitute 152:4
constituting 147:4
constrained 9:22
consult 159:20
consultation 77:17
consulted 64:3
consulting 8:3, 5, 6; 32:4
contact 41:18; 48:22, 24,
52:21; 62:18; 106:8; 198:2
contacted 123:16
contacts 107:5
contain 119:24; 122:18
contains 118:4; 119:22
context 110:12; 111:3, 7
continue 127:12
contribute 72:12, 14, 17,
20, 22; 74:4, 13; 75:6;
77:15; 78:1, 15; 93:12;
95:12, 21; 97:6, 22; 98:17;
99:1, 16, 17; 102:11, 24;
158:24; 161:22; 162:8, 14,

17
contributed 101:16
contributing 77:21;
78:11; 158:8
contribution 19:4, 8, 10;
78:21; 101:9, 19, 21, 23,
24; 102:3; 105:22; 106:2;
111:16; 126:3; 127:8;
129:18; 131:16; 133:6, 14
contributions 74:20;
107:20; 128:11; 132:8, 12,
17, 25; 133:21; 154:6;
158:2; 160:7, 9; 163:22;
221:14
Contributors 132:15, 23
controversial 165:8
convenience 106:18;
151:22
conversation 28:19;
33:21; 34:3, 4; 57:19;
38:25; 39:7, 15; 42:13;
44:2; 47:23; 48:6; 66:24;
71:18, 20; 92:20; 97:20;
99:4, 5, 7; 100:4, 10;
109:10; 126:13, 22;
129:15, 22, 25; 130:1;
131:12, 13; 144:13;
156:14, 18; 157:14;
161:10; 169:2, 18, 20, 24;
170:2, 5, 9, 11; 188:3, 11;
193:13; 205:19
conversations 24:16;
29:5, 7, 12, 20; 30:4; 32:9;
33:17, 36, 1; 38:5; 49:23;
50:8, 98:19; 99:14;
100:19; 108:6, 10, 17;
110:12, 116:20; 128:25;
169:15, 170:15; 193:25;
194:2, 6, 203:14
conversations-and
32:15
coordinated 15:7
coordinator 7:23, 24
copied 60:18; 189:15
copies 28:11; 67:2
copy 26:12, 27:17; 52:17,
67:7; 117:18, 164:10,
183:10
corporation 25,
78:15, 18, 23, 97:6, 14, 22
corporations 72:12, 16,
73:1, 8, 74:4, 5, 13, 96:25,
98:17, 99:1, 16; 100:1,
154:11, 20, 155:18,
156:21, 160:11, 161:22,
162:13, 17
corporations-could
96:22
corporations-not 96:21
corporations-that
161:18
could-foreign 99:16
couldn't 49:11; 64:4;
72:20; 96:14, 23; 97:16;
154:14
couldn't-no 96:16
counsel 4:4, 7, 14:1, 2;

15:9; 16:13; 20; 20:19;
28:18, 23; 30:5; 33:23;
35:22; 40:1; 49:25; 52:17;
66:21; 67:6, 10, 10; 75:14,
17, 18, 23, 23; 76:1, 3, 3, 6,
9, 10, 15, 17, 20; 77:5, 10,
11; 92:16, 24; 100:19;
131:22; 145:17; 159:15,
18, 20; 165:17, 19, 22;
166:2; 167:12; 181:10;
182:10; 198:15, 22;
207:17; 214:2; 224:7
counsel's 18:17; 19:1,
11, 15; 21:10, 14; 51:22;
64:5
counsel-additional
198:14
Counselor 85:18
countries 221:20
country 14:23; 15:3, 8;
82:23; 89:15; 101:13;
128:14; 173:8; 175:7;
180:22
couple 5:2; 23:1; 44:6;
53:24; 77:3; 110:8; 116:2;
124:8; 222:11
course 14:15; 27:7; 58:8;
67:1; 85:15; 88:7; 103:15;
108:25; 116:1; 118:19, 23;
184:22, 23, 24
court 223:13
courthouses 102:16
cover 79:4; 186:18; 206:5
coverage 194:23
covered 29:24; 37:1, 5;
97:4
covering 88:2
Crawford 43:6
create 22:21; 23:6; 24:1,
12; 103:17; 206:25
created 18:2; 24:6; 52:5;
84:9, 11, 21; 109:16
creating 23:11, 20;
24:17; 25:8, 10
creative 74:8; 177:24
creditor 61:13; 103:4;
104:1, 2, 3, 9
criteria 80:2, 4; 133:13
cross-you're 114:12
Crowe 43:18, 20
Cuban-American
188:21
culminate 88:12
current 32:4
custom 35:19; 53:4
cut 78:25
cycle 82:25; 102:8, 10;
117:1; 210:13; 218:15;
219:15

D

daily 128:22; 129:1
Dan 43:21
data 190:12

date 127:23; 183:12;
214:15, 23
dated 118:1; 150:7, 17;
151:25; 208:18, 23;
209:13; 214:11; 219:8
David 188:8
Davos 12:14
day 14:25; 41:24, 25, 25;
47:2; 50:9; 88:19; 90:4, 4;
105:4; 109:4, 5; 110:18,
20; 127:22; 128:6, 9;
129:2; 147:8; 166:5;
190:20, 20
day-to-day 9:2; 90:2
days 32:22; 153:2; 194:3
deal 78:13; 154:5;
158:12; 181:20, 22
dealing 126:10, 12;
189:23
deals 206:12; 212:13
death 68:24; 164:4
Dear 208:19
debt 111:17
debtor 61:14; 104:5, 8,
18; 148:11, 14
December 8:16; 194:23
decide 203:18, 19
decided 189:22; 203:8
decision 99:21; 158:12;
160:25; 175:21; 196:18
decisions 16:9, 14;
109:5; 117:6; 155:4
declined 53:23
deem 60:8
defense 35:6
defer 200:8
deference 198:14
define 50:7; 94:9; 103:9,
171:12
defining 115:3
definitely 73:23; 148:18,
195:24
definitions 115:20
degree 10:11
degree-1 32:13
Delaware 7:10
delegation 174:24
deliberate 175:21
demand 110:13
Democratic 12:10, 11,
11; 134:21
Democrats 90:18
Denning 43:21; 51:11;
52:24; 58:17; 68:11; 71:9
deny 118:9, 12
Department 7:25
depending 116:5
deposition 4:23; 28:6;
29:1; 39:17; 40:3, 5; 57:8;
58:3, 5; 79:2; 87:13;
103:14; 117:22; 119:1;
135:25; 144:21; 149:19;
166:4; 167:19; 185:24;
191:6; 198:17; 207:12;

213:23; 223:15, 17, 23;
224:3, 6
depositions 79:8; 94:13,
19
deputy 6:22; 7:12
derive 75:9
describe 200:17; 208:17
described 147:7
description 25:8; 59:3,
16; 60:5, 8; 61:14; 63:24;
126:24
designated 181:20, 22
designed 178:11
designing 137:17
desirability 89:3, 8
desirable 65:1, 3, 4
desire 89:9, 22
destroy 190:16
determination 53:18;
64:25; 65:8
determine 57:2, 20
determined 65:19
determining 133:13
develop 58:25; 154:8
developed 51:16; 88:11;
165:2; 206:2
developing 61:25
Development 7:25;
88:16
did--if 197:10
didn't--I 197:10
difference 140:3; 142:25;
145:15; 160:5; 210:7
different 16:8, 10; 18:1,
3, 25; 14; 49:20; 54:20;
56:9, 21; 76:8, 12; 82:21,
21; 96:2, 3, 98:5, 8,
101:13; 109:15, 18;
110:18; 112:23; 128:13;
136:8; 139:18; 155:2, 16;
158:6, 160:2, 164:17;
173:9, 176:13, 15; 177:22;
190:11; 212:7, 8, 216:18
differentiate 32:2, 46:24;
47:1, 91:3, 109:15, 18
difficult 46:24, 47:1;
115:3, 175:24; 178:18
difficulties 217:22, 24
difficulty 191:8
direct 16:12, 18, 30:8;
31:3, 6, 11, 37:4, 74:7;
111:7, 114:4; 115:19;
143:21; 152:3; 154:24;
172:1, 209:2, 211:6;
212:21; 220:15, 221:18
directed 213:10
direction 16:15; 32:3;
52:4; 64:8; 71:13, 24; 72:4,
6, 24; 78:13; 88:23; 99:13,
21; 154:5; 172:18, 22
directions 64:5, 7
directly 10:12; 12:3, 4;
36:18; 49:18; 109:20;
113:25; 114:6; 115:7, 14,
22; 141:11, 181:11;

215:25
director 7:10, 12, 15;
8:13, 19; 13:20, 20, 21, 24;
14:5, 9, 10; 15:2, 5; 26:24;
25; 27:8; 41:14; 42:4; 45:4;
47:11; 51:7; 53:13; 66:8;
102:5; 129:20, 22; 132:6;
22; 138:25; 139:3; 140:17;
143:16, 20; 148:21;
149:16; 153:5; 161:20;
183:16; 184:14; 187:12;
192:11; 201:23; 202:1;
205:14, 17; 224:14, 24
director--strike 13:8
directors 13:12; 14:12;
82:20
disagree 35:9; 55:19;
58:2; 212:18, 20
disagreeing 35:21
disagreement 56:7
disappointment 183:20
discovered 56:1; 118:19
discovery 118:20;
121:25
discrete 200:5
discuss 41:8; 58:24;
109:1; 147:16; 160:24;
178:6; 188:2; 189:20;
194:9, 13; 205:18; 222:16
discussed 8:24; 24:24,
24, 25; 25:2; 50:10, 10;
79:21; 80:2, 3; 91:11; 92:8;
109:4; 147:9; 151:14;
152:23; 160:14; 161:1, 6,
14; 173:6, 7, 9, 11; 175:2,
4; 176:8; 178:8, 14
discussing 147:20;
194:11; 220:2
Discussion 31:23;
79:16, 19; 90:14; 101:22;
154:4; 158:11; 159:7;
168:22; 169:8; 175:2;
179:1; 188:9; 193:6, 10;
200:10; 216:25
discussion--was 107:9
discussions 90:21;
110:15; 111:3; 123:18;
159:13; 173:18, 211:11;
217:13
disinclined 136:18
dismissed 181:12
distinct 74:4
distinction 131:11
distinctions 153:12
distinctly 175:19
disturbed 138:11, 12
Division 183:8, 19
do--I 141:6
document 20:11, 25;
27:25; 28:17; 54:15, 17;
56:2; 57:18; 82:24; 87:11,
17, 18, 23; 88:4, 13; 92:23;
25; 93:4; 107:25; 117:14;
118:4, 8, 14; 119:5, 6, 15,
15, 20, 22; 120:2, 14;
122:2, 7, 11, 16; 123:1, 2;
126:11, 12, 14; 135:23;

136:5, 7, 22; 140:6;
144:18, 24; 145:7; 146:3,
16, 19, 20; 147:3, 7, 11,
12, 13, 18, 21; 149:18, 21;
150:4, 7, 17; 151:7, 19, 19,
25; 167:15, 21, 24; 168:13;
17; 185:20; 186:1, 3, 7, 17,
20; 188:13, 23; 207:9, 15,
18, 20; 208:4, 8, 13, 17,
18, 20, 22, 25; 209:3, 13,
16, 16; 214:1, 2, 5, 9, 18,
22, 23; 215:1, 4; 219:8, 14,
16, 223:15
document--do 92:19
document--well 150:1
documentation 25:20;
55:3; 63:3, 20, 24; 64:6;
86:14
documents 18:11, 25;
28:2, 4, 12, 16; 36:16, 20,
22, 24; 51:17, 19, 23, 25;
52:5, 8; 54:21; 55:1, 56:12,
17; 57:20; 58:7, 25; 63:12,
21; 64:9; 66:12, 13, 13, 14,
15, 20; 67:2; 81:17; 86:5;
118:25; 119:11, 23, 24;
120:10, 20; 121:3, 9, 24;
122:17; 136:14; 148:2, 3;
186:14; 190:16, 20, 23;
192:23; 223:18, 18, 21, 21,
24
documents--other
186:16
doing--going 28:25
Dole 8:15; 27:21; 83:24;
198:22
dollar 117:5
dollars 84:16, 23, 101:17;
102:12, 25; 103:24; 116:6,
17, 123:14
Don 41:4; 43:23, 25; 44:1;
129:13, 15, 19, 20; 174:21,
23
don't--either 51:5
don't--I 81:22; 82:13, 16
donation 134:13
done 5:9; 24:17; 44:21;
52:4, 56:3, 58:9; 62:2;
66:22, 70:12, 82:10; 93:9;
107:25, 110:7, 117:14;
127:2, 128:17, 132:5;
152:23; 168:6, 8, 10;
173:13; 183:6, 191:19;
195:9, 198:25, 213:20;
219:23; 220:2
done--after 111:15
donor 215:17; 216:9
donors 92:13; 107:19;
133:22, 220:10, 11, 12
door 130:13, 191:14
down 7:11; 19:8; 47:2;
69:21, 73:20; 102:17;
110:19; 114:3, 128:10;
134:6, 180:15; 183:7;
184:3, 198:25
drifted 22:25
duly 4:5; 167:10

during 11:15; 12:2; 16:3;
23:1; 24:24; 27:7; 39:2;
67:20; 68:5, 17; 71:4;
83:18; 84:2, 25; 97:11, 12;
100:14; 103:1; 105:19;
106:14; 110:10; 116:1;
127:10; 128:2; 134:17;
135:14; 162:11; 172:9;
209:7; 210:6; 211:22, 23;
212:10, 11; 218:19, 21;
219:15; 220:22, 24
duty 218:3, 6, 7

E

e-mail 56:8
Each 19:22; 20:1, 13, 18;
21:4, 5, 6, 9; 50:25; 68:5,
13; 223:14
Eagles 216:22
earlier 30:18; 43:7; 49:1;
51:8; 61:24; 68:23; 88:13;
105:9; 128:9; 147:7, 10,
22; 148:4; 154:3; 157:20;
173:17; 175:6; 200:7
earlier--I 38:4
earliest 106:18
Early 6:24; 7:9; 8:2, 7;
60:22; 92:22; 99:11;
153:2; 176:7, 7; 194:3;
196:2; 197:12
ears 15:10
easier 116:10
Economic 12:14
Ed 44:5
editorial 163:2; 178:23
educate 7:6
educational 5:13; 6:5
effect 144:14; 170:3
effective 137:8
effort 91:24; 105:6;
106:24; 155:2, 3; 168:25
efforts 27:9; 100:5, 8, 11,
24; 106:20; 108:21, 22;
109:3, 9; 124:16; 125:14,
15
eight 151:20; 202:18, 18;
215:1
Either 20:5; 51:22; 52:4,
24; 55:19; 60:18; 67:6;
72:3; 75:22; 86:6; 99:23;
115:22; 124:5; 153:25;
162:25; 170:11; 181:8, 23;
196:15, 19; 197:25
elaborate 217:15
elaborating 206:4
elect 109:9; 115:16
elected 8:12; 14:21;
22:16; 24:1; 102:15, 21;
103:8; 105:3, 16
electing 104:23
election 6:17; 7:14, 18,
21, 24; 8:16; 16:5; 25:3;
26:15; 102:8, 10; 105:7,
10, 13; 109:2; 110:8;

112:12, 19; 113:3, 17, 25;
117:1; 127:10; 205:3;
206:12; 210:13; 218:2;
219:15
elections 15:4; 117:7;
123:11
else 39:18, 19, 23; 41:6;
45:21; 59:20; 79:5;
131:15; 148:5; 173:22;
175:13; 177:23; 192:17;
195:25; 196:20; 203:13
else's 146:12
employed 45:12
employee 33:22, 24;
37:19; 38:16; 39:1, 8; 40:8,
16; 135:11
employees 137:21, 22;
139:11; 173:24; 196:10
end 32:22; 82:25; 88:14;
162:12, 16; 164:1; 214:22
ended 8:15
engage 222:20; 223:2, 5
engaged 107:6; 188:14;
222:21
engaged--had 219:11
England 7:15
enough 14:18; 20:10;
21:2; 22:2, 5; 40:14; 62:17;
90:21; 95:24; 96:5; 109:7;
110:23; 165:17; 185:7;
223:8
ensure 132:8, 11;
162:21; 163:22; 170:13
ensuring 16:2
entail 81:22; 82:4
entered 223:17
Enterprises 8:17
enthusiasm 206:25
entire 13:11; 71:4; 199:10
entirely 94:15; 118:22
entities 92:17; 148:6;
178:21
entitle 201:10
entitled 29:25; 121:3;
211:5; 215:1
entitles 201:13
entity 12:7; 24:12; 92:18,
149:14; 178:7
equal 109:17
error 122:18
Especially 175:23;
178:17; 196:14
essential 140:3
established 179:5
estate 8:6
estimate 172:7; 199:22
Evans 6:12; 8:3, 4, 7
even 55:23, 24; 56:25;
70:25; 90:5, 18; 92:7; 94:7;
156:16; 200:17; 213:23;
188:23; 206:12
event 48:18; 83:25;
85:20; 89:21; 118:12;
119:3; 181:8; 198:17;
199:8; 209:19, 20

event--refer 214:18
events 210:5, 12, 17, 24;
211:1, 2; 215:23, 24
ever--were 134:15
every 9:18; 17:14; 18:4;
19:4, 8, 10, 14, 19, 22;
20:1, 13, 18; 21:4, 5, 6, 9;
30:14; 50:12, 14, 25;
51:17; 54:7; 69:6; 88:19;
98:4, 8; 105:4; 109:4, 5;
110:18, 20, 25; 117:5;
128:6, 9; 161:4; 177:6;
178:3; 184:18
everybody 82:7; 91:4;
92:17; 224:11
everything 9:6, 22; 12:1;
15:11; 16:22, 24; 27:5;
58:11; 78:7; 88:19
evidence 130:12
exact 152:9; 177:6
exactly 49:8; 105:8;
114:18
examination 4:4, 7;
167:12; 224:7
examined 4:6; 167:11
example 33:1; 93:20;
178:6; 182:24
examples 182:17, 17;
201:5
exceed 212:16
except 101:8; 182:3
exception 148:22; 165:5
exception--l 143:12
excess 111:16, 24;
123:12
exchanged 82:6, 8
excluded 33:11
excluding 100:17
exclusion 13:14
Excuse 64:8, 68:11;
109:23; 157:19; 186:2
execute 22:17, 27:5
executed 52:12; 66:22
executing 18:10; 27:5
executive 10:8, 1, 13;
19:26, 24, 25, 27, 8, 41:13;
45:4, 47:10, 15; 53:13, 13;
102:5, 132:6, 22; 138:25;
139:3, 140:17, 148:20;
149:15, 153:5, 161:20;
171:2, 4, 5; 183:16;
184:14, 201:23, 202:1;
205:14, 17, 224:14, 24
exhibit 87:12, 13, 16, 17;
21, 117, 22, 123:3, 6, 10;
135:21, 25, 136:3, 4, 8;
138:6, 144:20, 21; 149:19;
152:4, 167:16, 19, 24;
168:1, 170:17; 185:23, 24;
187:19; 193:4; 207:12;
213:22, 23; 214:13
existed 194:12
existence 52:1; 54:21
exists 36:2
expected 100:7

expenses 53:15; 55:17
expert 74:2; 113:8
explain 8:21; 53:12;
58:20; 93:1; 99:6; 212:23;
217:25
explained 51:8
expressly 24:11
extends 7:3
extent 9:21; 115:25;
117:9; 153:11; 169:7
eyes 15:10; 178:22

F

facilitate 123:12
facilities 93:4
facility 141:18; 143:9;
144:2, 15, 17; 190:23;
191:1, 3; 192:2, 6, 8
facsimile 150:18; 186:14,
18
fact 5:24; 55:13; 56:3, 7;
67:9; 72:9; 78:9; 94:14;
97:21; 98:16, 25; 99:15;
108:11; 109:1, 22; 116:22;
120:11; 122:3; 130:24;
143:7; 161:14; 174:10;
186:17, 20; 219:24
facts 123:21, 21; 124:1;
143:13
Factual 214:10
Fahrenheit 15:17
Fair 20:10; 21:2; 22:2, 5;
40:14; 62:10, 12, 17;
90:21; 95:24; 96:5; 98:3;
10; 105:24, 25; 109:7;
110:20, 23; 124:19;
137:10; 150:15, 24;
152:21; 153:9; 185:7;
200:9, 210:15; 223:8
fairly 51:17; 117:1
faith 132:4
fall 125:22; 127:18;
183:19
familiar 146:7; 209:11,
20; 210:4, 23; 211:1
far 7:4
far?--could 158:24
fax 151:25; 186:19;
187:4; 198:1
faxes 189:16, 17, 18;
190:3
February 7:19; 8:8, 11,
13; 24:18; 85:1, 1, 10;
134:18
FEC 190:25; 220:20;
221:1, 7, 14
Federal 16:5; 94:9;
111:11; 113:3, 17; 175:22;
206:12; 218:2; 219:15
feel 136:18
feet 217:23; 220:8
felt 49:12; 83:4; 179:7
few 137:18; 140:24;
177:6; 197:5; 223:11, 20

fiction 175:24; 178:18;
182:18; 183:3
field 15:3; 190:13, 13
Fierce 43:23, 25; 44:1;
129:13, 16, 19, 20; 130:13,
24; 131:8, 13; 174:21, 23;
175:3
fifth 193:16
figure 79:3; 202:6
figured 78:17; 165:17
file 60:13, 23; 70:16, 17,
19; 190:6
filed 96:2, 3
files 27:21; 37:12; 47:5, 8,
9; 56:10; 82:16; 190:8, 10,
19; 192:14, 18
filing 190:21
fill 83:4; 132:20, 23;
133:22
filled 132:15
final 175:9
finance 14:9; 94:9;
106:16; 107:2; 113:8;
114:18; 134:6; 187:12;
203:10
finances 217:6; 219:18,
20, 21
financial 165:9; 198:3;
215:1, 2; 217:22, 24;
219:12
financially 50:23; 217:23
find 50:19; 51:4; 54:12,
21, 22, 55:21; 90:25;
120:20
Fine 65:8, 95:4, 7; 117:21;
168:11, 206:11; 213:2;
219:16
finish 126:9
finished 97:25; 176:17,
18, 19
Fire 147:2
firm 8:3, 76:21; 143:18
first 4:5, 17, 8, 18:16, 20,
22, 23, 21, 19, 20, 21;
26:12, 36:6, 25, 38:10;
47:17, 49:9, 12, 76:8;
79:14, 87:11, 124:9;
136:3, 137:18, 142:1,
145:10, 151:6, 10, 15, 16,
16, 20, 152:3, 189:25,
196:6, 209:7, 223:25
five 37:9, 107:10; 108:5,
17, 158:19
flabbergasted 151:9
flushed 158:9
flow 51:25, 52:6, 154:8;
197:15, 17
focussed 85:8
Foley 28:11
folks 153:24, 191:7
follow 59:1, 72:21;
181:18
followed 93:1; 153:22,
24; 154:3, 205:6
following 210:20

follows 4:6; 37:11
for--the 128:1
fora 24:25
forcefully 183:23
foreign 71:19, 25; 72:9,
12, 16, 17, 22; 73:1, 8, 9;
74:3, 4, 12, 22, 25; 75:2, 5;
77:25; 78:14, 23; 93:20;
96:20, 21, 24; 97:6, 22;
98:16, 25; 99:15; 100:1,
11, 24; 134:16; 154:6, 11,
17, 19; 155:5, 13, 17, 25;
156:16, 20; 157:10, 18, 19;
158:2, 5, 7, 22; 159:8, 11,
14; 160:7, 9, 11; 161:6, 11,
15, 17, 22; 162:8, 13, 17;
168:25; 169:17, 19, 21, 25;
221:19, 20, 23; 222:1;
224:25
foreign--foreign 97:14
forget--that 142:19
form 59:8
formal 147:8; 199:3;
203:6
formally 194:24; 203:1, 7
formation 21:16
former 33:21; 38:25;
39:1, 7; 40:7, 8, 16, 16, 23;
41:9
formerly 135:1
forms 54:9, 11; 96:3
Formulate 212:21, 24
forth 59:8, 23; 65:25;
133:24
Forum 16:17, 19, 20;
23:8, 9; 24:6, 14; 27:10;
38:17; 39:9, 10, 12; 44:22;
45:2, 19, 24, 25; 46:2, 8,
17, 20; 49:11; 53:23; 60:5,
9, 13, 16; 61:1, 3, 14, 17,
20; 62:5, 17; 63:9, 16;
64:22; 65:2, 6, 10, 13, 14,
21; 68:3, 7, 14, 17, 23;
69:1, 8; 70:4; 72:10, 13,
15, 18, 23; 73:2; 74:13, 19,
25; 75:7; 76:3, 7, 14; 77:7,
16, 22; 77:11, 12; 79:15;
80:21; 81:12, 19; 82:19;
83:6; 84:19; 86:13, 24;
88:11; 89:12; 90:22;
91:11, 14, 18; 92:1, 3, 14;
93:3, 11, 14, 24; 94:1;
95:13, 16, 21, 22; 96:8, 25;
97:7; 98:17; 99:1, 18;
100:12; 101:9; 102:25;
104:17; 108:8; 112:14;
113:10, 12; 117:8; 123:13;
124:17; 125:17; 131:1, 6;
132:9; 135:12, 17; 138:3,
8; 142:9, 12, 21; 143:10;
144:2, 6, 25; 147:6; 148:7,
10, 21; 149:16; 152:10, 16;
156:15; 157:9; 158:25;
159:9, 12, 17, 19; 160:3;
161:12; 162:18, 22; 164:5;
165:12; 167:18; 172:24;
173:8; 180:21; 181:9, 14,
15; 186:15; 224:16

Forum's 62:8; 75:16;
137:1; 138:6
Forum--l 165:8
forums 88:11; 89:5, 15;
90:11, 19; 142:3, 10;
175:7; 180:21; 195:21
forward 16:19; 72:3, 3
Foundation 188:21;
201:8
four 5:2; 37:9; 44:16;
70:7; 98:8; 107:10; 108:5,
16; 184:18; 214:22
fourth 123:10; 146:3;
187:19; 193:16
frame 29:8; 201:23, 25;
210:7, 9; 218:19, 21, 25
frame--any 218:21
Fran 142:16
frantically 134:25
Fred 123:11; 124:11
Fred's 123:15
frequently 165:9, 11;
171:19; 172:8
Fresno 181:9, 14
friend 44:1, 20
Friends--and 208:19
from--even 114:5
frustrated 179:4, 8, 10,
13, 16, 18; 180:10, 20;
181:3
frustration 179:21;
180:14
full 4:10; 54:1; 58:10;
169:7; 170:20; 200:2
full-time 15:25; 16:1
fully 85:4
function 25:23; 33:18;
134:12; 179:7
functioned 183:15
functions 12:14, 15;
14:19; 18:1; 24:13
fund 83:17, 18; 109:5, 6;
113:20; 201:20
fund-raiser 44:20; 48:10
fund-raisers 14:24
fund-raising 4:15; 44:21;
45:1, 7, 10, 19, 24; 46:7,
14, 17; 71:14; 76:15; 77:6;
85:16, 22, 25; 86:24; 87:7;
107:6; 153:16, 18, 21;
163:17, 19; 164:2; 170:6;
173:14, 18; 175:11; 189:1,
11, 14; 193:7, 14; 194:1, 7,
9, 12; 195:12, 15; 209:8;
211:12, 20, 25; 212:4, 5;
213:9; 215:8, 10, 25
funded 84:2, 13, 14
funding 16:10; 175:10;
201:18; 203:18, 23
funds 84:24; 109:8;
148:5; 195:18
further 152:23; 167:11;
206:9

G

garbage 189:24
Garrity 143:19
gather 121:19
gathered 136:11
gave 54:6; 119:24;
132:15; 177:20; 221:13
Gees 51:5
Geisnier 44:13, 14
general 14:1; 15:9;
18:17; 19:1, 11, 15; 20:19;
21:10, 13; 40:25; 41:1;
50:24, 25; 64:5; 71:12;
72:6; 75:11; 79:16; 107:1;
112:11; 113:22; 126:24;
145:17; 172:23; 200:18;
206:23, 25; 216:8
general—the 67:9
general—were 216:7
generally 16:2; 47:6;
170:9
generated 81:18, 20;
101:22
Georgia 202:21
germanic 112:24
get-go 92:17
gets 139:6
Gillespie 44:5
given 4:23, 24; 5:4, 8;
36:4, 58:10; 154:5; 155:8;
162:4
giving 5 25, 19:8; 99:23;
224:3
glad 79:5
goal 81:19, 82:24
goals 65:23, 82:7, 18;
83 1, 92:8, 172:21, 193:7,
14, 194 1, 3, 7
goes 209:18
good 14 18; 54 8, 101:25;
123 7, 140 11, 166 1;
168 14
GOP 90 11, 16, 18;
105 15, 18, 106 15, 22;
109 8, 128 1, 141 4,
182 20
GOP's 106 11
GOP-TV 139 6, 13, 15,
141 2, 9, 143 15, 22
Government 8 2
Governmental 4 5, 8,
119 11, 12; 120 9; 122 1,
167 13, 224 8
governors 102:16
Graduated 6 6, 7
graduating 6 9
grant 129:5, 130:25,
131:5, 16
granted 87:2; 165:14, 16
great 125:6; 193:23;
212:19
Greener 14:1; 143:16, 17

Griffith 44:11
Gross 198:24
ground 137:19
Group 8:4, 7; 12:11;
114:1; 201:8, 40, 11;
219:18, 20
group's 219:18
groups 32:10; 83:15, 15;
177:22; 202:10; 204:6;
216:9
groups—is 84:21
guarantee 123:19
guarantees 199:20
Guesnier 188:3, 4, 5
guess 52:13; 85:9;
119:19; 150:24; 172:7;
185:19; 205:3
guessing 200:22
guesstimate 185:9
Gunn 47:23, 25

H

Hailey 8:12, 20; 19:24;
20:3, 5, 8; 25:1; 42:9, 11;
45:20, 23; 51:1; 130:20,
23; 147:16; 150:7; 152:5;
153:6; 174:2; 182:5;
187:6, 6; 189:13; 194:25;
209:17; 210:5, 12, 16, 24;
211:1
Hailey's 22:13; 174:4, 5
half 98:4; 106:14, 21;
109:2, 11
half-hour 98:9
Hampshire 7:23
hand 33:10
handful 171:13
handicap 94:22
handle 72:7, 8; 99:13, 22
handy 109:2
happen 178:20; 199:19
happened 27 21; 49:13,
54:5; 82:15; 138:15;
141:5; 219:14
happening 63 2
happy 168:8; 191:7,
224:4
hard 113:6; 116 6,
123:13, 14
Harris 48:5
Harrison 48:7, 8, 9, 10
has—h's 118:16
hasn't 123:25
hat 46:25, 25
have—and 223 18
have—did 37:18
have—they 220:3
have—was 156:19
haven't 9:22; 44:12; 94:7,
19
Hayward 204:21; 205:9;
222:10

head 69:21; 80:21;
153:13, 14; 180:15; 184:3;
185:8; 188:21
headed 204:19
headquarters 113:2
heads 204:25
health 182:19
hear 10:4; 17:1; 24:25;
98:23; 107:7
heard 24:24; 25:2; 101:1;
141:24; 182:14; 222:7, 9
hearing 160:21
hearings 82:22
heating 127:20
heck 32:20
held 26:15; 69:8; 82:22;
88:12
hello 42:12
help 11:2, 8; 12:6, 12;
103:7; 113:12, 20; 115:15,
16, 22; 119:17; 123:12, 14;
125:14, 15; 143:5; 176:19;
183:9; 189:5; 217:22;
220:5
helped 142:19; 220:8
helpful 10:8; 31:20;
109:14, 18; 136:10; 143:7
helping 7:6; 11:24; 12:2,
3, 4, 4; 110:14
Hennick 48:16, 17
Henry 42:15; 187:8, 8, 9,
10, 10
Here's 10:14; 25:13
here—I 119:8
Heritage 201:8, 8
Hess 14:4, 15:25; 145:14,
16
highest 203:23
Hill 6:7, 10; 48:21; 150:8;
152 5; 160:24; 161:1, 7
Hill's 152:8
him—I 124:20
Himmelman 48:23
hired 8 19; 10 9, 9; 11:5;
196 16, 16, 19; 197:5
hiring 196 14, 21, 197:6,
"
his—after 138:15
hoc 133 17
Hold 121 16, 187:7
holds 151 1
Hong 101 5, 135:8, 13
honorary 12:16, 17
hope 76 5
hoped 149 12, 179:23
hour 98 4
hours 177 6, 10
House 118:5; 119:1, 10;
120 11, 121:9, 24; 122:6;
123 15; 130:5; 144:25
housekeeping 224:1
Housing 7:25
Howlett 48:25; 49:3;

68:20, 21
human 28:22
hundred 94:13
hundreds 181:17
hypothetical 219:22

I

I—I 21:23
I—why 28:25
I.D 186:19
I.e 186:17
idea 17:11; 18:1; 22:11,
13; 23:11, 16; 64:17, 19;
88:17; 89:1, 18, 19; 106:2;
118:12; 119:14; 159:21,
24; 178:24; 186:6; 196:6;
213:13; 214:2
ideas 14:24; 23:24;
65:24; 69:25; 137:13;
153:18; 173:9; 177:20;
178:2
identification 87:14;
117:23; 136:1; 144:22;
149:20; 167:20; 185:25;
207:13; 213:24
identified 57:23; 98:19;
188:12
identified—or 123:21
identify 14:19; 87:22;
123:1; 152:22; 168:4, 5;
179:17
identifying 126:18, 20;
133:22
IDU 134:20; 135:2, 2
if—to 115:25
It—yes 115:12
ignorant 13:14, 15
illegal 93:21; 212:16
imagine 45:3; 192:16
imagine—and 111:25
implementing 89:25
implications 4:20
important 25:17; 33:3;
62:16; 93:8; 119:8; 189:20
impose 192:21
impression 76:2; 106:4
improper 120:8; 121:5;
177:11; 212:17
improperly 122:7, 10;
136:14
improving 180:24
in—are 114:7
in—I 134:19
in—since 154:2
in—house 67:10
inadvertently 54:8;
55:25; 60:19
inasmuch 110:7
incident 71:17; 72:2
inclined 118:11; 119:18
include 27:15; 96:10;
113:24

include—by 55:6
included 70:3; 154:16
includes 55:7; 223:18
including 98:20; 113:1;
155:18; 163:19
incommunicado 50:21
incomplete 219:12, 19
incorrect 138:8
increasingly 175:24;
178:18
increment 98:9
indicate 89:11; 100:7;
108:20, 22, 23; 125:25;
158:1, 4; 179:13, 20;
180:8; 186:14; 214:19, 22
indicated 30:18; 116:19;
126:2; 129:2, 4; 180:19;
181:2; 187:20
indicating 118:5; 147:25
indicative 121:22
indirect 114:7, 9; 115:20
indirectly 115:4, 15, 22
individual 15:25; 32:4;
40:18
individuals 17:2; 29:2;
30:4, 18, 25; 68:25; 91:9;
188:12; 194:14
individuals—that 15:24
informal 133:2, 16
information 54:24, 25;
55:7; 77:16; 85:24; 97:6;
132:24; 157:16; 158:22;
161:5; 180:9; 191:5
informed 32:20; 102:23;
183:2
informing 92:12
infusion 50:13, 17;
63:10, 17; 85:14; 164:1
inkling 105:21
input 82:24; 207:7;
222:24
inquire 131:25; 132:3;
200:5
inquired 132:2
inquiry 29:16; 198:13;
200:6
inside 35:5; 67:10
instance 63:13
instances 50:20; 104:10
instead 171:10
instituted 138:25; 139:2
institution 197:14
institutionalized 92:11
instruct 132:7; 155:22;
156:2, 5, 22; 210:17
instruction 29:10; 30:16;
37:2; 95:2; 155:7, 8;
223:12
instructions 51:19
insult 17:20
insulting 17:21
intend 58:11; 208:13
intensively 110:8
interest 78:11; 103:2, 3,

25; 104:20; 105:18;
116:24; 130:9, 12, 14, 19;
137:12; 154:1; 158:8;
192:25; 194:18; 224:11
interested 10:18; 58:7;
123:17; 173:2; 178:1, 3;
194:19; 209:5; 213:18
interfere 103:14; 182:20
interim 182:19
interjecting 98:2
intern 6:14
International 12:10, 11,
12; 134:20
interpose 206:6
interpreted 206:13
interrupt 25:21
interrupted 168:15
interview 80:7; 196:10
into 36:1; 41:4, 7; 42:11;
44:6; 48:17; 50:17; 88:15;
103:25; 112:6; 113:11;
120:10; 159:8, 12; 161:12;
197:17; 206:1
introduced 223:15, 23
inure 116:2
investigating 4:14
investigation 121:10;
224:12
invited 90:19; 181:9
involve 89:15; 122:1;
201:18
involved 14:25; 16:9;
22:6, 8; 47:19; 69:10;
75:21; 81:15; 88:20;
90:19; 92:3; 105:15;
132:5; 182:22; 195:2;
211, 24; 213:17; 215:12,
14, 25, 224:11
involves 201:17
involving 91:9; 175:2
Iowa ~ 23
Irregularities 215.2, 2;
219 12
irrelevant 94:22
is-1 212.15
is-this 97:24
is-when 199:14
isn't-I'm 17:24
isolated 17:25
issue 35 4, 15, 36 1, 43:8;
58 2, 10, 12; 72:7, 8, 22;
73 5, 76 11; 78:3, 97:10;
99 13, 130:7, 157:21,
160 21, 175:11; 182:25
issues 8:7, 16:19; 50:9;
71 22, 82:21, 88:24,
163 17, 19; 175:6, 7
it's-I 177:6
it's-you 208:19
it-does 56:8
item 92:4; 195:20
items 189:14
itself 52:14; 208:25;
215:4

J

J-o-s-e-f-i-n-k 15:23
Jack 7:20
January 7:19; 8:16; *
37:20; 38:14; 39:5; 40:10,
18, 24; 41:21; 42:9, 15, 18,
21, 25; 43:18; 47:24;
194:23
Japan 211:10
Jay 14:11; 41:21, 23, 24;
42:6; 51:7; 165:5; 192:5, 7
Jeannie 13:19; 14:20;
204:17, 18
Jeff 186:2
jeopardized 170:14
jeopardizing 182:12
Joan 222:8
Job 72:21; 106:17;
128:12; 130:3; 162:24, 25;
163:4, 12, 15
jobs 190:9; 192:10
Join 70:14
joint 35:6; 195:3, 5
Jorge 188:18
Josefiak 15:16, 18, 21
Jr 197:21
July 185:20; 186:15
jump 5:14
June 37:16, 20; 38:12,
13, 15, 22, 23; 40:18; 88:2;
150:7, 17; 151:25; 152:6;
159:15; 167:16; 168:5;
178:16; 185:1, 3, 4, 5
June-at 159:7
June-between 37:20

K

Keep 13:23; 27:17; 32:16,
19, 19; 47:9; 67:2; 70:17;
82:16; 108:11; 120:23;
186:22; 190:7, 10, 25
keeping 127:25
Kelly 44:13
Kelly-is 188:3
Kamp 7:25
Kamp's 7:20
Ken 48:21; 150:8; 152:5,
8
Kennedy 222:5
kept 52:8; 55:24; 67:5, 6;
69:11; 70:16, 19; 107:5;
112:1; 146:17; 190:14, 20;
192:2, 13, 19
kind 17:21; 24:17; 52:15;
54:25; 59:2; 60:8; 63:24;
67:8; 81:18; 90:12;
123:17; 146:16; 190:21;
197:24
kinds 8:5; 93:20; 113:1;
128:2
Kip 48:25; 49:3, 4; 68:20,

21
Kirk 39:15, 19, 22; 42:24;
47:16
knew 43:16; 45:13;
46:12; 49:8; 64:22; 72:14,
19, 21; 76:3, 24; 78:22;
97:13, 16; 124:9; 130:20;
165:16; 196:16; 203:5
knowing 82:14
knowledge 16:1; 45:25;
46:1, 4, 5, 6, 7, 10; 47:4;
50:20; 54:9; 55:19; 59:20,
23; 64:20; 67:5, 7; 76:15;
85:10; 109:17; 118:8;
123:20; 133:1, 11; 141:21,
23; 142:18, 22, 24; 143:9;
145:3; 151:6; 159:19, 22;
174:9, 18; 181:24; 192:8,
18; 193:3; 195:19; 209:8;
210:11; 212:3; 214:5;
216:3, 6; 222:19; 223:3;
224:15, 23
knowledge-or 76:4
knowledge-your
174:17
knowledgeable 85:4;
114:17; 143:15
knows 25:17; 80:25;
124:1; 140:8, 9
Koch 188:8, 9
Kong 101:5; 135:9, 13

L

labeled 118:16
Labor 127:22
lack 89:13; 169:9
lady 68:18
laid 175:6; 178:9
Lanny 44:11
Lardner 28:11
Large 116:13; 198:13
largest 103:4; 104:1, 2, 3,
18; 148:10
Larry 14:6
last 8:16, 15, 20; 23:1;
28 4, 10, 19; 29:12; 30 5,
33 18, 34 23, 47 20,
106 21, 107 10; 108 5, 16,
109 2, 110 8, 116 1, 20,
183 19, 186 17, 197 3,
206 17, 209 2, 220 15
lasted 171 23
Lasting 171 22
late 37 17
later 112 2; 150 4
latter 105 14, 106 14
Lauder 188 1, 5
laundering 221 20
law 72 19, 73 13; 118:2;
162:9, 10, 210 19
Lawrence 6 6
laws 16 5, 94:10; 114:1;
115:25
lawyer 56 1, 73 18; 74:2;

76:1; 77:18; 99:5
lawyers 15:19; 26:3;
35:5, 6; 114:2; 132:4;
165:6, 10, 12; 171:3
laying 197:13
lead 150:19
leaders 173:10
leadership 51:10, 13;
78:12; 152:11; 173:10;
175:8; 177:21; 179:4;
220:5
learn 135:11; 162:10;
165:15; 182:10
learned 126:21; 154:18
learning 97:10
least 18:1; 53:4; 76:5, 5;
87:7; 104:14; 184:18
leave 57:10; 58:4;
190:14; 191:21
Lee 43:4, 5
left 7:1; 27:20; 41:25;
45:13; 134:18; 136:2;
140:7; 141:5
left-called 142:8
legal 14:2; 15:10; 16:25;
17:13; 18:4, 8, 16; 19:6;
31:8, 13; 32:1; 55:4; 56:5,
6, 19, 25; 58:2; 65:15, 17;
66:18; 73:10; 74:1; 75:14;
17, 18; 76:1, 6, 9, 10; 77:5,
10, 11; 94:5, 24; 100:3;
112:25; 116:4; 132:9, 12,
17; 133:3, 7, 15; 154:6, 18;
155:3, 21; 156:4; 158:9,
10; 159:15, 18, 20; 163:22;
181:13; 206:3, 4; 212:14;
224:20
legally 15:11; 16:22;
71:25; 72:9, 12; 74:20;
93:14; 94:1; 95:16, 22;
97:14; 99:16, 17, 25;
100:1; 112:25; 115:16;
116:6; 132:5; 154:15, 16;
160:6, 8; 161:11, 15;
162:20; 206:14; 211:5
legs 198:9
Len 7:8; 14:6
lend 194:5; 197:13
landing 16:20; 49:21;
50:22; 90:2
length 124:22
lent 112:7, 9, 10; 148:15;
149:15; 215:16
less 128:22
lesser 172:3
Let-go 138:10
letter 37:12, 13; 118:1;
123:24, 25; 124:9; 132:19;
179:5; 215:19; 220:6, 16;
223:16
letters 122:20, 21
letting 114:14
liable 66:19
liaison 130:5, 9; 174:23
life 198:7; 199:20
like-which 24:12

like-minded 83:11; 84:1
likely 114:7, 9
liking 158:15
limitation 13:14; 157:10
limitations 94:3; 95:12,
20; 155:25; 160:1; 161:11
Linda 76:21, 22; 165:20
line 126:10; 136:2; 172:1;
200:6; 209:3
lines 200:8
list 32:9, 10; 153:22;
156:10; 165:2; 215:24, 25;
216:2, 5; 220:6, 9, 11, 12
listener 181:9
Listening 88:9, 10, 14;
89:1, 12; 90:6, 11; 136:24;
137:5; 138:1, 7, 24; 139:4,
6, 16; 140:18, 22; 142:2, 6,
8, 10, 11; 183:1
lists 192:13; 215:17
Literally 120:22
little 10:7; 25:11; 35:25;
82:3; 107:24; 109:22;
121:4; 154:9; 179:4;
186:13; 191:12; 200:19
live 70:24, 25
lived 132:16; 133:23
living 222:20
loan 17:8; 18:10, 23;
19:14, 22; 20:25; 21:6, 9;
50:15; 51:16, 18, 25; 52:5;
53:20, 21; 63:11; 64:6, 9;
66:15, 19, 25; 81:17;
103:5; 106:5, 6, 11, 15;
107:11; 108:12, 21, 23;
110:16, 21; 111:5, 14, 14;
112:2; 116:21; 117:9;
123:12, 18; 124:17;
125:16, 17; 126:3, 6;
127:8; 129:5, 18; 130:7,
25; 131:5, 16; 146:19;
147:5; 148:18, 19; 197:16
loaned 20:14; 86:12;
147:9
loans 18:2; 19:18; 62:1;
108:8; 147:6; 192:22
Lobbying 8:6
lobbyist 49:4
located 191:1
location 52:15
logistical 79:1
logo 201:16
long 5:20; 6:16; 76:20,
21, 22; 119:21; 138:19;
162:19; 165:20; 171:22,
23; 200:13; 205:5; 209:13
look 35:24; 86:5; 123:3;
147:12; 150:14; 175:16;
185:20; 192:3
looked 19:21
looking 32:25; 52:14;
57:25; 87:21
looks 146:7; 150:13;
152:7; 189:12
loop 60:23

looser 25:12
Lord 100:15
lot 12:17; 46:14, 14; 73:6;
75:12; 127:13; 176:8, 13,
15; 183:10; 190:7; 194:18;
195:14, 14
Louis 25:3; 26:13, 18;
75:18, 20
lunch 104:14; 166:2;
167:4

M

M 187:15, 17
Maas 188:18
mail 16:12; 164:24
main 31:24; 32:14
maintain 94:14; 175:24;
178:18; 219:21; 221:23,
25
major 14:12; 16:14; 216:9
Majority 94:16; 151:7, 10;
186:8, 11; 207:21; 214:6;
223:21, 24, 25; 224:7, 12
makes 164:16; 210:7;
224:19
making 16:15, 21; 80:1;
90:8, 10; 101:9; 107:19;
109:5, 123:23; 124:16;
125:14, 15; 126:3; 127:8;
128:11; 129:4, 18; 136:17,
19; 141:2, 5; 158:14;
185:14, 192:22
manage 47:2
Managed 15:3, 6; 137:17;
192:5; 204:12; 213:13;
221:17, 224:21
manager 8:15
managing 59:12; 90:3;
172:21, 25
mandate 30:10, 12; 31:2;
32:1, 55:5, 56:19, 206:2;
210:8, 211:4, 212:16;
219:6
Manufacturers 49:5
many 5:1, 19:17, 18;
30:16, 25, 36:5, 8, 9,
50:10, 70:6, 224:5
march 206:1
Mark 43:2, 48:23; 149:18,
213:22
marked 87:11, 14, 17;
117:23, 25, 135:24; 136:1;
144:19, 22, 146:4, 149:20;
167:16, 20, 185:22, 25;
207:13, 213:24
Martin 213:1
Mary 43:6
Maryland 191:2; 192:2
match 111:11
matching 116:5
material 60:22
math 38:11
Matt 43:18, 20
matter 25:22, 33:3; 40:4;

50:24; 71:8, 11; 117:3;
132:21; 224:1
matter—the 50:25
matters 32:25; 41:14;
88:3; 165:4
may 9:21, 23; 20:8, 24,
25; 21:23; 22:3; 25:14;
28:16; 31:20; 32:5; 33:1,
11; 35:9; 37:17, 17; 38:4,
20, 20; 41:23; 43:7; 50:19;
51:11, 11; 61:22, 24;
63:11, 14, 14; 65:3; 77:2;
78:10; 87:15; 90:6; 91:2;
95:2; 109:14, 18; 116:6, 6;
120:19; 121:2, 16; 122:11;
133:1; 134:6; 136:20;
138:7; 139:22, 24; 142:18;
143:2, 5; 148:15; 149:4;
150:9; 164:9, 9, 10;
168:11; 170:18, 22;
173:16; 178:10; 179:5;
180:11; 182:4; 183:19;
189:8; 195:1; 196:1;
204:13
may—I 215:16
may—if 122:10
maybe 56:6; 73:15, 16;
84:5; 150:3; 168:7;
171:20; 172:11; 182:8;
199:7
Mayor 7:8
McAllister 47:15; 174:2,
21; 182:7; 187:7
me—the 125:18
Mead 43:6
mean 17:9; 24:19; 29:21;
31:25; 32:13; 33:23;
35:24; 47:12; 51:21; 52:9,
10; 55:2, 8, 58:3, 63:24;
67:9, 13; 73:14, 75:23;
86:8; 90:12; 91:4, 4; 92:15,
105:23; 110:23; 115:4,
119:8, 8, 12, 121:4; 134:5,
138:18; 149:6, 150:3;
168:4; 172:2; 176:9, 10,
12, 15; 177:5, 185:4;
187:20; 195:13, 199:19;
201:11; 208:7, 218:6
Meaning 116:14, 16,
153:12; 217:3, 24
means 75:23, 125:2;
176:13, 15
meant 155:4; 193:2
mechanism 153:21
meet 53:14, 14; 68:5, 16,
171:11
meeting 21:19, 20, 21,
25:3; 38:10; 49:9, 12;
60:22; 68:1, 2, 6, 69:6,
70:1; 71:23; 80:23, 81:3, 3,
4; 88:2; 91:8, 12; 92:5,
98:7; 110:25; 152:14;
159:7, 10, 11, 14; 161:3, 4,
171:14, 16; 172:4; 173:2;
174:13, 20; 175:2, 4;
183:19; 201:15
meetings 21:16, 24;
22:3, 4; 24:16; 67:17; 68:9,

20, 25; 69:2, 7, 7, 10; 70:3,
8; 71:9, 15, 21; 90:22, 24;
91:1, 6, 7, 14, 17, 17, 19;
92:16, 22; 97:18, 19;
142:5; 144:10; 151:14;
161:4; 171:16, 23; 172:2,
11, 12, 16, 23; 173:3, 6, 8;
175:12; 201:14; 203:2
meetings—the 151:16
members 14:5; 91:21
members 91:24; 92:2,
12; 130:10; 195:1; 202:18,
19; 203:3
memo 51:14; 77:9, 12;
78:6; 137:1; 140:10;
141:25; 152:4, 4, 24;
155:17; 157:17; 158:11;
162:25; 167:17; 178:16;
189:13
memorandum 152:12,
13; 155:5; 168:5
memory 25:14; 86:10;
92:25; 129:15; 130:24;
189:2, 12
memos 81:20, 25; 82:8,
12, 15; 161:3
men 183:7
men's 55:25
mention 56:6, 12, 18;
130:25
mentioned 42:24; 78:10;
88:13, 91:9; 126:23;
128:9, 130:21, 22; 132:16;
147:22; 148:4, 173:14;
194:16
merely—may 151:1
merely—the 151:1
met 68:13; 124:13;
135:22, 171:10, 12, 172:8;
173:22, 23; 174:10, 18;
175:14, 180:1, 185:24,
184:16, 18, 185:8, 17,
196:15, 19, 21; 197:18, 20,
20, 21, 21, 222:7, 9, 10, 11
Miami 188:22
Michael 14:4, 42:18,
145:14, 16, 167:17
middle 56:1, 102:7, 9, 14,
23, 105:6, 10, 13
might 12:12, 25:19,
138:17, 159:8, 194:15
Mike 150:8, 152:5, 187:17
Millie 187:15
million 84:16, 23, 101:17;
102:12, 25, 103:24;
111:17, 24, 115:10;
125:12, 126:4, 129:2
millions 116:16
Mills 205:12
mind 11:14; 82:19; 83:14,
16, 173:13, 21
mine 29:3; 44:1, 51:22;
129:24, 146:13; 171:1
minimal 218:8
MINORITY 4:7; 119:17;
129:8, 167:12, 207:17;

224:12
minute 57:12; 138:13
minutes 69:11; 79:3, 10;
206:18
misleading 9:21
missed 62:12; 168:7, 11
mission 144:10
mistake 111:2
mistaken 90:18; 178:9;
181:18; 184:25; 192:23;
197:7; 217:21
Mitchler 14:10; 187:12
modest 88:17; 178:2
Molly 47:20
moment 10:18; 17:6;
24:9; 31:17, 21; 34:3;
57:14; 60:2; 104:12;
115:8; 119:20
monetary 221:19
money 16:20; 19:9;
20:14; 48:9; 49:21, 22;
50:13, 17, 22; 51:1, 4;
52:1, 6, 22; 53:2, 8, 14, 17,
23, 25; 54:4; 58:21; 59:5,
9, 17, 24, 25; 60:10; 61:2,
6, 15, 18, 23; 62:8, 18, 21,
22; 63:10, 17, 25; 64:12,
15, 17; 65:1, 7, 10, 16, 20;
66:20; 69:1; 71:19, 24, 25;
73:2, 9, 9; 74:25; 75:1, 13;
77:21; 78:1, 15; 81:7;
84:14, 23; 85:2, 4, 6, 11,
14; 86:1, 6, 7, 12; 90:2;
93:11, 17, 20, 24; 94:1;
95:16, 23; 96:7; 97:15;
99:15, 25; 100:1, 5, 11, 24;
103:6, 10, 10; 104:23, 25;
105:5, 19, 20; 106:9, 14,
17, 21; 109:1, 4, 16, 16,
19, 19, 20; 110:9, 9; 111:4,
7, 8, 10, 11, 12, 14; 112:3,
13; 113:10; 115:11, 14;
116:11, 13, 25; 117:9;
123:13, 14; 124:16;
125:19; 126:1, 19, 25;
127:3, 6, 9; 128:2, 6, 13,
17; 129:5; 130:8; 131:2,
25; 132:15; 147:8; 148:15;
149:15; 154:11, 15, 16, 19;
155:17, 25; 156:16, 20;
157:10, 18, 19; 158:5;
159:8, 11, 14, 16; 161:6,
11; 164:1; 165:6; 168:24;
169:16, 19, 21, 25; 188:5,
9, 12, 15; 194:5, 15;
197:14; 203:10; 217:19;
220:3; 221:20; 224:25
money—the 103:6
Monies 81:9, 11; 86:15;
112:22, 113:11, 19; 114:5,
5; 115:7, 21; 148:1
monitor 128:12
month 171:20
monthly 136:24; 138:6
months 7:11; 28:10, 20;
29:13; 30:6; 33:18; 34:24;
44:6, 16; 107:11; 108:5,
17; 110:8; 116:2, 21;

140:7, 24; 175:23; 178:17;
184:16
more 10:17; 30:9; 31:12;
53:23; 56:24; 58:21;
62:18, 21, 22; 63:10, 17;
82:4; 85:14; 87:6, 6; 89:7;
102:12, 24; 110:10; 117:7;
121:4; 128:22; 129:2;
167:5; 171:7; 191:7;
193:17; 206:19
morning 169:5; 176:8;
177:4, 13; 192:24
Morris 39:16
most 61:6; 64:17; 73:23;
85:2, 2, 10; 101:18;
111:10; 143:14; 177:24;
192:7
mostly 8:6; 202:4
move 181:9
moved 7:9, 14; 71:7
moving 117:1; 153:21;
179:23; 183:10
much 35:25; 66:25;
101:16; 111:22; 122:20;
125:25; 129:7; 181:12;
183:18, 21; 194:5
must 54:2; 145:25; 151:3,
24; 153:25; 158:14; 163:3;
184:1, 5; 186:12
my—if 119:19
myself 79:20; 158:14;
186:13
mystified 186:13

N

name 4:10; 32:3; 47:20;
48:12; 68:19; 76:21;
135:1; 188:18; 201:12
named 23:10; 47:17;
48:10; 132:3
names 68:22, 153:25
narrow 107:23
National 6:19; 7:19; 8:8,
9, 10, 14; 9:7, 9, 10; 10:10;
11:16; 12:20, 21; 13:1, 2,
11, 14; 21, 15, 7, 16; 16, 18,
20; 19:23, 20; 13, 15, 19;
21:11, 22; 19, 20; 23:4, 8,
9, 12, 14; 24:6, 13; 27:1, 9;
34:6; 38:16; 39:8, 10, 12;
40:8; 41:25; 43:8; 44:21;
45:2, 19, 24, 25; 46:1, 8, 9,
11, 13, 17, 19, 23; 47:7;
49:11, 16; 50:2; 53:22;
60:4, 7, 9, 13, 16, 25; 61:3,
13, 17, 20; 62:5, 8, 17;
63:9, 15; 64:22; 65:1, 6,
10, 13, 14, 21; 66:1, 15;
67:10; 68:3, 7, 14, 16;
69:1, 5, 8; 70:3; 72:10, 13,
15, 17, 20, 23; 73:2; 74:13,
19, 24; 75:7, 15, 76:2, 7,
14; 77:7, 15, 22; 79:15;
80:21; 81:12, 13, 14, 19;
82:19; 83:6; 84:2, 3, 6, 9,
12, 19, 22; 85:11; 86:13.

23; 88:11; 89:12; 90:22;
91:11, 14, 18, 22, 25; 92:1,
3, 6, 7, 12, 13; 93:2, 3, 10,
13, 16, 19, 23, 25; 95:13,
16, 21, 25; 96:1, 7, 13, 15,
18, 25; 97:7, 21, 23; 98:17;
99:1, 18; 100:12; 102:25;
103:4; 104:17, 17, 25;
108:8; 112:11, 14, 19;
113:10, 12; 117:8; 121:23;
124:17; 125:16, 17;
128:13, 22; 130:8; 131:1,
3, 6, 14, 17; 132:7, 8;
135:12, 15, 17; 137:1;
138:3, 6, 8; 141:10, 11, 14,
18; 142:4, 9, 12, 21;
143:10; 144:2, 5, 15;
145:4, 8, 19, 21, 24;
146:15, 18; 147:4, 5, 6;
148:7, 10, 21; 149:16;
152:10, 16; 156:15; 157:9;
158:25; 159:9, 12, 16, 19;
160:3, 6; 161:12; 162:18,
22; 164:5; 165:7, 11;
167:18; 172:24; 186:15;
187:14; 201:3, 4, 14;
215:12, 15; 224:16, 16, 24
nationalities 209:5;
211:11
nature 60:20
necessarily 30:13;
64:15; 130:12
necessarily-I 206:17
necessary 60:8; 65:6, 9,
12, 12, 14; 75:19; 90:13;
128:16; 190:8
need 25:24; 29:3; 54:20,
71:23, 83:4; 103:9;
107:11, 12; 110:9; 111:4,
5; 128:1; 132:17; 148:1, 5,
153:23; 154:7; 188:1;
197:16; 208:21; 215:19
needed 22:13; 23:16,
53:2, 7, 14, 17; 59:5, 8, 17,
25, 62:21, 22; 71:22; 72:4,
6, 23, 78:12; 92:22; 99:12,
20; 103:6, 6, 10; 148:5;
152:22, 23; 154:4; 160:22;
194:4; 197:14; 220:5
needs 128:1, 13, 169:8;
189:3
negative 144:17
negotiated 8:23
neither 41:8; 113:8
never-this 97:3
nevertheless 147:1
New 6:7; 7:15, 23, 48:8;
58:25, 93:8; 97:3; 135:1;
163:12
news 126:21
newspapers 32:17
next 26:5; 129:24;
130:13; 135:23; 146:1,
149:18; 175:16; 181:5;
182:16; 183:17, 22;
185:22; 199:9; 206:7
nice 104:11
Nicksles 41:4, 4, 11, 16

night 42:11
no-I 184:7
Nobody 183:14; 184:13;
196:1
nodding 67:8, 12; 69:21;
180:15; 184:3
non 112:23
non-auxiliary 216:9
non-profit 75:12
none 48:20; 182:23;
203:20; 212:2
nonprofit 161:16
nor 113:8
normal 118:19
normally 192:3
Northeast 7:13
not-depending 29:17
not-I 125:7; 171:15;
192:20
not-I'm 200:23
not-I'm-sir 97:25
Not-it 75:4
not-Linda 76:20
Not-no 107:7
not-was 60:23
notary 4:6
notation 150:18; 207:25
note 9:20; 118:3, 8;
145:6; 168:12; 182:24;
186:2; 213:25
notes 165:13; 207:16
Nothing 108:11; 213:19;
218:14; 223:6
notice 199:12; 223:24
notification 163:25
notified 101:8, 10;
125:18; 127:5, 7; 129:6
notify 58:25; 148:4
November 6:17
NPF 17:12; 18:2, 2, 18;
19:15, 23; 20:14; 21:7, 10,
16, 22:12; 27:15; 28:1, 3,
5, 12, 17, 19; 29:1, 6, 14,
19, 21, 22, 24; 30:5, 11,
14, 19; 31:5, 10, 16; 32:9,
33:19, 22; 36:10; 37:21;
39:5, 25; 40:17, 24, 25;
41:8, 9, 11, 14, 18, 42:13,
43:8, 13, 15; 44:3, 9; 45:7,
11, 13, 15, 17; 46:25; 47:5,
5, 48:3, 9, 10, 19; 49:6, 7,
15, 18, 20, 24; 50:10, 12,
15, 18; 51:1, 4; 52:21;
53:17; 54:25; 55:4, 56:6,
12, 18; 58:16; 59:1, 8, 15,
23; 66:16, 23; 68:24;
70:17, 19; 71:19, 23, 24;
75:17; 76:9, 10, 23; 77:1;
82:16; 84:3, 7; 85:5, 15,
16; 87:6, 7; 90:5, 10;
94:10; 96:18; 97:15;
99:12, 21, 25; 101:24;
102:2, 4, 12; 103:25, 27;
104:8; 106:8, 13, 17;
107:6, 11, 21; 108:21,
110:16, 22; 111:5; 116:21,

23; 125:15, 19; 126:3;
127:8; 129:5; 130:7;
131:17; 141:6, 18, 22;
143:4, 5; 147:9; 152:23;
153:1, 3, 6, 14; 154:2, 5, 5,
11; 155:17; 156:1, 20;
157:18; 158:1, 4, 10;
160:8, 19; 161:16; 163:16,
22; 164:2, 8; 165:1, 4;
170:3, 6, 12; 172:17;
175:21; 176:1, 6, 23;
177:19; 179:2, 5; 180:14;
181:10, 21, 22; 182:1, 10,
18; 185:8, 17; 188:9, 13,
15; 189:1, 10; 192:22;
193:7, 14; 194:1, 10;
195:4, 12, 16, 21; 196:5,
11, 22, 23; 197:8
NPF's 85:2, 11; 144:10;
165:21; 170:13; 180:5;
182:12
NPF-are 224:17
NPF-related 29:20
NPF-RNC 198:3
number 15:18; 16:8;
18:1; 50:9; 71:22; 82:22;
83:10; 92:2; 117:21;
118:4, 17; 119:22; 122:9;
136:7; 149:24; 151:8;
155:1; 163:18; 168:13;
186:4; 187:4; 205:15;
214:1, 25; 223:19
numbers 122:21, 22;
207:15
numerous 50:8; 164:15

O

oath 4:18, 21; 5:25;
25, 25, 73:22; 167:6, 7;
224:4
oath-that 106:19
object 30:7; 31:1; 38:18,
20; 94:5; 128:4, 5; 155:20;
211:3, 14
objected 183:23
objecting 125:4
objection 206:6
objectives 206:24
obligation 65:16, 17
obligations 8:21
obliged 62:5
obscuration 207:25
obscure 124:5
observation 49:21
obtain 124:16; 127:3
obtained 120:7, 10;
121:3, 122:11; 145:1
obtaining 106:3; 118:25
obtaining-about 108:7
obviously 16:25; 25:17;
29:6, 65:15, 115:10;
132:21, 151:4; 163:11;
173:21, 178:16; 189:14;
198:16, 223:25
occasion 54:3; 76:6

occasional 60:17;
68:19, 20; 107:8, 18
occasions 36:5, 9
occasions-I'm 36:8
occupation 133:25;
134:1
occur 62:10; 133:10
occurred 19:17; 20:18;
21:4; 63:14; 215:23
October 127:19; 150:18;
152:1
of-I 17:9
off 16:13; 19:12, 15, 20,
23; 20:2, 3, 5, 5, 7, 9, 16,
20, 21, 23; 31:22, 23; 57:9;
68:23; 137:19; 147:22;
193:9, 10; 200:10
off-out-of-the-building
190:22
offended 25:23
offer 222:23
office 6:14; 13:16; 18:17;
19:1, 11, 15; 21:11, 14;
27:18, 20; 32:20; 33:4, 5;
39:20, 22; 41:23, 24;
47:13; 52:18; 64:6, 7; 67:3,
6, 7; 69:3, 9; 71:10;
129:24; 130:13; 133:3;
143:24; 164:22; 199:15,
15; 202:4; 204:12, 14;
207:5; 213:10; 221:16
officer 9:1, 3; 16:4; 20:15;
26:22; 53:13; 134:9;
202:17
officers 14:19
offices 118:2; 130:6
official 12:10; 33:22;
37:19; 38:16; 39:1, 8; 40:8,
16, 23, 23; 58:2, 7, 14;
135:11; 200:20, 24
officials 68:16; 69:8
offing 105:22
often 161:3; 173:17;
205:8
old 190:23, 24
once 41:7; 43:7, 10; 54:5;
143:13; 171:20; 184:18;
197:5, 12; 205:10, 13;
222:13, 14
one 18:1, 4; 23:18, 25;
24:11; 38:5; 42:11; 46:16;
50:19; 51:12; 52:13;
63:22; 68:22; 71:21, 23;
76:9, 12; 78:15, 17; 84:18;
87:3, 4, 9, 19; 90:15; 92:4,
21; 99:10; 102:11; 104:10;
115:8; 121:16; 126:7;
128:25; 139:15; 143:4, 23,
24; 146:4; 148:15, 16, 22,
23, 24; 150:6, 17, 19;
151:18; 153:9; 174:20;
181:12; 182:24; 183:7;
186:20; 187:20; 191:12;
192:10; 194:12, 21; 196:2;
197:3, 18; 203:5; 204:10;
215:16, 18; 220:18;
223:12, 224:10

one-have 220:18
one-you 88:7
one-way 106:5
ones 156:20; 196:2
ongoing 137:12; 175:7
only 63:13; 72:11; 74:3;
75:5; 83:25; 88:7; 106:20,
24; 118:24; 132:22;
133:20; 148:14; 149:14;
155:15; 160:11; 175:20;
184:8; 186:10; 199:11, 12;
205:19; 208:9; 209:4;
211:10; 213:17; 215:12,
23; 218:25
only-did 163:24
open 209:4
opened 211:10
operate 61:25; 104:25;
112:1; 175:19
operated 76:18; 85:7;
183:18; 184:8
operating 9:1, 3; 16:4;
20:15; 26:22; 112:11;
134:8; 202:16
operation 15:1, 7;
164:15; 175:23; 180:5
operations 206:24;
222:16
opinion 29:25; 55:2;
74:1; 76:11; 122:7
opportunity 35:15, 17;
90:17
opposed 26:3
or-I 28:16
or-let 152:18
or-you're 216:17
oral 188:25
Orally 86:3
order 127:2; 190:1;
199:20; 206:4
organization 49:22;
81:10, 22; 83:25; 135:3;
163:12; 172:21; 175:17;
176:6, 9, 13, 23; 177:19;
178:4; 182:25; 190:8;
201:2; 203:15
organizations 46:15, 16;
75:12; 83:10; 84:7, 10;
143:3; 181:8; 195:10;
201:19; 203:17; 204:25;
215:11, 14; 216:9, 24;
220:13, 21; 221:5, 8, 10,
14; 224:17, 21, 22
organize 175:21
organized 176:2; 192:15,
16
organizing 178:6
original 136:4; 151:24;
208:3
originally 208:8
others 175:3, 20
Otherwise 10:21;
103:12; 194:14; 200:7
ought 73:5; 88:23, 24;
119:9, 13; 128:11; 151:19;

153:1, 3
out 16:10; 17:22; 25:2;
29:8; 32:17; 42:1; 51:4;
54:12, 21, 22; 55:21;
70:11; 79:3; 81:21; 83:1, 3;
90:25; 92:24; 93:6; 111:8;
10; 113:4, 5, 5; 114:3;
121:13; 131:9; 132:15, 20;
23; 133:22; 136:6, 14;
138:3, 4; 139:15, 22;
143:3, 3; 149:5, 6; 158:9;
175:6; 178:9; 183:11;
188:1, 21; 189:5; 190:17;
191:13; 192:6; 196:20;
197:13; 198:25; 199:3, 15;
204:12; 215:19
outline 13:13
outlined 126:13
outlining 82:10
outset 175:17
outside 11:8; 22:4; 29:15;
31, 2, 7, 13, 21; 32:1;
181:10; 210:8; 211:4, 20;
212:14, 219:5
outside—that's 29:15
outside—what 11:9
outstanding 57:18;
108:8, 12; 110:21; 116:22
over 8, 8, 15:8; 28:19;
30:5, 35:15, 16, 51:10, 14;
58:16, 62:6, 67:8, 16, 16;
71:7; 85:15, 15, 101:17;
110:14, 15; 126:3, 127:14;
140:10, 12; 152:9; 172:12;
176:14; 177:11, 11; 180:1;
12, 183:1, 184:16, 22, 23,
24, 215:7, 22, 224:5, 5
over—probably 127:14
overall 15:6
overhead 113, 2, 24;
202, 4
overseas 211:13
oversee 220:20
oversight 215:7, 10, 22
owed 110:21, 111:8,
116:23, 127:9, 130:8
own 8:17, 64:1, 127:12,
86:25, 90:25, 165:10, 12,
205:2

P

p.m. 166:4, 5, 167:2
pace 180:12, 21
page 123, 5, 145:6, 10;
146:1, 2, 3, 163:18,
170:17; 182:16, 186:17,
18, 18, 187:19, 21; 214:17,
21, 220:15
pages 150:13, 14;
151:15, 17, 20, 21; 152:4
paid 9:23; 12:19, 25;
45:24; 46:1, 8, 13; 104:21;
106:6, 112:22; 113:4;
117:9; 141:11, 149:9, 12;
195:17; 196:4, 5, 9; 202:4;

215:23
Pam 47:17
panel 181:9
Paoletta 7:8
paper 28:15; 56:9; 62:10;
82:6, 8; 101:4; 174:1
papers 81:18; 124:8
paperwork 132:20;
147:8
paragraph 123:10;
136:3; 168:22; 170:20;
175:16; 181:5; 182:16;
183:17; 214:22, 25;
220:18, 18; 221:18
paragraphs 123:22
parallel 144:8
parentheses 183:22
parents 162:8
part 16:11, 12, 13, 14, 21;
18:7; 21:24; 22:15, 19;
23:2; 47:17; 57:7; 105:14;
111:2, 17; 112:3; 128:12;
136:3; 137:8, 12; 147:9;
163:10, 11, 15; 178:9;
192:12; 194:22; 201:3
participate 80:17, 20;
81:5; 171:16; 176:4, 5, 22;
188:8, 11; 193:13, 25
participated 173:1;
194:2
particular 95:20, 132:7;
196:12
particularly 114:17;
178:3
parties 12:12, 14, 25,
16:10; 46:15
parts 128:13, 183:10;
186:16
Party 11:12; 19:8, 22:13,
22; 23:16, 19, 22, 24:1, 10;
25:10; 33:22, 24, 69:9;
70:19; 71:2; 80:20, 24;
81:12; 82:1, 9, 18, 83:2, 6,
11, 13, 17; 84:13, 15,
88:23; 108:7, 112:25,
113:22; 123:17, 128:13,
148:16, 22, 24, 149:7, 8,
163:16; 167:18, 181:7,
207:1; 221:22; 224:14
Party—other 132:23
passed 194:19
past 192:4; 193:19
patience 224:4
patient 206:15, 17
Patrice 143:19
pay 12:22; 81:7; 86:2,
106:14, 18, 21; 107:11,
108:21; 117:8
paying 106:5
payroll 45:18; 49:16,
53:11, 14; 61:6, 11, 12,
64:18; 148:5
pending 35:2; 176:11
Pennsylvania 6:8
people 29:12; 32:9, 10;
51:12; 68:24; 80:7; 88:8;

103:13; 132:18; 153:32,
25; 175:8; 177:21; 182:3,
6; 190:9; 194:18; 197:6
people—that's 91:10
percent 54:6; 111:11;
113:5, 5, 17, 19; 115:7, 10,
13
percentage 113:14, 14,
16; 114:11, 13
perfectly 150:15
perhaps 175:3
period 7:17; 9:6; 11:15;
12:2; 16:3; 39:2; 49:7, 25;
50:5; 67:21, 22, 24; 68:6;
17; 76:16; 83:3; 84:2;
96:11; 97:11, 12; 100:14;
103:1; 105:19; 110:10;
128:2; 131:6, 21; 138:15;
171:20, 24; 172:9, 10, 12;
180:2; 202:16; 210:17;
211:22, 23; 212:10, 11, 14;
220:22, 24
period—well 209:7
periodic 172:2
periodically 26:21; 27:4,
12
peripheral 219:6
permissibly 93:12
PERRY 9:20; 32:24; 35:9,
11, 13, 18, 21; 57:7; 78:25;
79:9
person 43:9; 48:14;
79:17, 22, 23, 24; 119:19,
19, 126:18, 20; 134:11;
181:20, 20; 184:8; 192:7
personal 9:24; 11:6;
32:25; 47:16; 132:24
personally 20:16; 88:5;
151:11
personnel 42:1
pertain 191:5
pertaining 55:4; 210:12;
219:15
pertains 210:16
perusing 87:23; 136:5;
147:13, 149:21; 167:21;
186:1
Philip 39:16
phone 32:7, 33:2, 58:17
photo 28:17
phrase 23:20; 64:1
Physically 164:20
pick 123:14; 208:6
piece 44:16, 56:9
place 36:12, 70:16;
82:14, 92:11, 99:7;
110:14, 15, 132:13;
133:13, 21; 134:6; 166:1;
167:13, 173:9, 12; 181:15;
190:19, 24; 211:20; 216:8,
10
placed 119:5, 15
Plan 25:6, 7, 7; 26:12;
27:12, 86:24; 87:7;
153:23; 154:8; 164:8;
178:9; 194:9, 12; 197:13;

199:20; 217:23
plank 21:25; 25:1, 4;
27:11; 194:22
planks 23:18
plans 164:15; 199:7
platform 22:15
play 17:17; 89:25;
140:18, 21, 24; 173:10;
177:21; 180:24
played 17:3, 13; 18:4, 8,
17; 178:4
playing 18:21; 175:8
please 4:11; 6:5; 10:21;
18:13; 33:15; 44:24;
53:10; 74:10; 116:9;
122:24; 124:7; 128:8;
177:16; 189:6; 191:24;
207:11; 213:22
pleasure 10:23, 25; 11:4,
5
pleasure—I 11:4
pledged 27:10
Poldovant 202:21, 23, 24
point 18:9; 33:8; 51:6;
54:9; 70:14; 101:25;
102:18; 136:6, 14; 139:5;
150:15, 23; 151:5; 154:3;
158:11; 183:24; 186:21
pointed 121:12
pointing 17:22
points 224:6
policies 14:24; 23:23;
83:12; 137:13
Policy 16:16, 19, 20;
22:14, 21, 23; 23:6, 8, 9,
11, 13, 17; 24:6, 14; 25:8;
27:10; 38:17; 39:8, 10, 12;
44:21; 45:2, 19, 24, 25;
46:2, 8, 17, 19; 49:11;
53:22; 60:5, 9, 13, 16;
61:1, 3, 13, 17, 20; 62:5, 8,
17; 63:9, 15; 64:22; 65:2,
6, 10, 13, 14, 21; 68:3, 7,
14, 17; 69:1, 8; 70:4;
71:24; 72:10, 13, 15, 17,
23; 73:2; 74:13, 19, 25;
75:7, 15; 76:3, 7, 14; 77:7,
16, 22; 78:11, 12; 79:15;
80:5, 21; 81:12, 19; 82:19,
21; 83:6; 84:19; 86:13, 23;
88:11; 89:12; 90:22;
91:11, 14, 18; 92:1, 3, 14;
93:3, 10, 13, 24, 25; 95:13,
16, 21, 22; 96:8, 25; 97:7;
98:17; 99:1, 12, 18, 21;
100:12; 101:9; 102:25;
104:17; 108:8; 112:14;
113:10, 12; 117:8; 124:17;
125:17; 131:1, 6; 132:9;
135:12, 17; 137:1; 138:3,
6, 8; 142:9, 12, 21; 143:10;
144:2, 5, 15; 147:6; 148:7,
10, 21; 149:16; 152:10, 16;
154:4; 156:15; 157:9;
158:12, 25; 159:9, 12, 16,
19; 160:3, 24; 161:12;
162:18, 22; 164:5; 165:7,
11; 167:18; 172:24;

177:22; 186:15; 224:16
policy—choose 23:20
Policy—strike 125:16
political 5:5, 9; 7:15;
12:12; 13:19, 21; 15:2;
73:5; 78:23; 172:21; 209:5
politically 153:10
politics 15:4; 75:11; 80:5
polling 190:12; 223:2
poor 219:11
poorly 186:19
portion 9:15; 10:5; 26:8;
110:3; 113:4; 115:1; 213:6
position 7:22; 67:20;
82:3; 94:13, 15; 152:8;
153:9; 190:9; 198:19
positive 144:17
possession 120:10;
146:17
possibility 106:9
possible 106:18; 138:14;
148:22; 223:14
possibly 52:17; 176:7
potential 44:16; 96:7;
137:8; 182:11; 196:10
Pottstown 6:8
power 83:3
practice 32:4; 53:4;
189:16; 190:3
practice—how 192:1
practices 4:15; 196:21;
211:25
precautions 224:20
precise 109:22; 148:13
prefer 199:2
prefix 119:25; 120:21;
121:23; 122:18; 136:8;
223:16
premise 160:14
premises 122:14
preparation 36:15
prepare 64:6, 9; 66:12,
20; 69:24, 25; 70:6
prepared 51:20; 152:17,
18, 20; 198:21
preparing 28:6
present 56:13; 156:11;
198:15
presentation 203:2
presenting 100:17
President 7:20; 198:22
press 15:6; 43:8, 9;
194:23, 25; 195:2
pressure 181:7
presuppose 150:11, 12
presuppose—and 150:9
pretty 132:18; 134:18;
200:23
previous 26:6; 76:12;
136:8; 184:16; 213:4
previously 5:22; 95:1;
156:3, 23, 24; 167:10
Price 217:3

primarily 103:7
principles 83:12
printer 183:11
prior 21:24; 22:4; 37:19;
62:9; 71:20; 80:24; 87:5;
123:11; 147:23; 178:13;
223:23
priorities 82:7; 83:2
priority 128:10; 207:8
privilege 37:1, 6
privileged 35:7
privity 71:18; 213:15
probably 8:8; 10:17;
27:18; 28:24; 36:13;
44:15; 52:16; 24:66:21;
70:11; 79:20; 129:12;
130:20; 132:2; 136:10;
146:19; 164:15; 172:11;
175:6; 177:24; 182:8;
190:11; 196:15, 19;
197:12; 200:6; 203:15;
204:23; 205:10
probe 109:17
problem 79:1, 6; 148:16;
183:5; 189:5
procedure 17:4; 132:25;
133:20
procedure-and 132:21
procedures 90:25;
112:11; 134:12; 216:8;
221:13
proceeding 200:2
PROCEEDINGS 4:1;
32:5; 199:10
process 16:11, 13; 38:9;
51:25; 52:5; 58:16; 61:24;
25:64:3; 80:13, 17, 20;
88:14; 92:11; 96:4; 99:11;
103:14; 109:16; 132:13;
14:133:2; 147:9; 177:9;
204:13; 209:6
processed 165:6
processes 134:5
processing 62:10, 14
produced 118:5, 9, 21,
22; 120:11; 121:9; 122:3;
4, 17; 144:24, 25; 146:20;
207:20; 214:6; 223:22, 25
producer 143:19
producing 82:24
product 175:9; 179:25;
183:11
production 55:14;
182:25
productions 122:6;
141:19; 142:12
Products 142:13
proffer 32:15; 121:22
program 89:13; 90:6, 6
programs 90:16; 222:22,
24
progress 90:6; 173:7;
175:7; 180:12
project 183:9, 9
promissory 165:13

promote 14:23; 223
promoting 137:13
promptly 198:18
proper 121:8
properly 114:3; 136:14;
205:6
proprietor 199:11
prospects 86:7, 15;
164:2
protocol 211:19
protocols 221:13
proud 113:8
provide 13:2; 24:13;
59:15; 61:1; 63:16; 65:1,
10, 16; 113:10; 131:2
provided 36:17; 61:2, 15;
81:7, 9, 11, 12; 84:22;
112:13; 122:8; 148:20;
151:7, 10; 157:16; 158:18,
22
providing 65:20; 106:9;
119:11; 121:24; 126:18
provision 175:22
public 4:6; 143:18
publication 88:13; 89:16;
173:11; 183:6, 8
publications 142:3, 11
published 88:15
published-1 142:7
pull 183:9
purloined 120:7
purpose 9:4; 11:2, 24;
33:18; 65:20, 22; 75:15,
77:6; 81:18; 83:5; 152:12,
13, 22; 172:16
purpose-is 152:21
purposes 11:20; 53:7,
18; 59:16, 25; 60:9; 79:10,
90:15; 107:6; 112:5;
168:5; 172:15, 16
put 25:1; 83:1; 92:11, 24;
93:6; 112:23; 115:8,
119:9; 120:22; 121:4, 19;
122:8; 138:3, 4; 139:15,
141:3; 152:18; 153:23,
154:2; 155:15; 158:10,
172:1; 173:12; 177:8;
199:6; 208:14
putting 60:9; 111:8, 10,
137:25; 139:12, 13
puzzled 154:10

Q

quality 178:2
quarrelling 218:7
questionable 133:14
questioned 133:7
questioning 126:9, 10;
200:8
quick 223:12
quite 23:13; 148:13;
183:23
quote 178:17; 181:5;

182:24; 183:17
R
R 136:7; 188:2; 223:16
R-N-S-E-C 112:16
R056377 88:6
races 109:5, 6; 110:18;
111:4, 8, 11; 128:10;
190:11
raise 48:9; 71:24, 25;
75:13; 77:20, 24; 93:11,
14, 17, 20, 24; 94:1; 95:16,
23; 100:5, 11, 24; 106:17;
191:6; 205:20
raised 86:6; 168:24
raises 54:8; 182:25
raising 69:1; 71:19; 86:7;
169:16, 18, 21, 25; 188:9,
12, 15
ran 7:8; 9:2; 21:25; 22:15,
15; 27:6; 41:4, 7; 42:11;
44:6; 48:17; 83:12;
143:19, 24; 194:22
range 27:13
rather 9:23; 10:15; 25:24
ratified 205:4
rating 178:2
RB 118:4; 119:22, 25;
120:3, 15, 21; 121:22;
122:16, 18, 136:9; 144:19;
146:4
re-elect 109:9
re-election 7:9
reach 64:4; 147:23
read 9:14, 15; 10:5; 26:8;
68:23; 87:22; 101:4;
110:2, 3, 115:1, 124:8,
147:11, 14; 189:22, 25;
190:1, 2, 4, 13; 208:21;
213:6, 220:18
read-read 208:20
ready 167:4
Reagan 10
Reagan-Bush 7:13
real 8:6
really 14:25, 21, 20,
54:20, 57:7, 88:18, 94:18,
22, 111:6, 7, 119:20,
121:17, 124:19, 127:20,
190:22, 171:15, 172:6,
177:9, 181:18, 187:5,
190:8, 198:19, 206:16,
219:22
really-there 111:6
reason 10:15, 54:2,
87:16, 120:6, 133:6,
145:9, 177:9, 212:15
reasonably 198:18
reasons 23:25; 84:18
recall 127:24, 129:25,
130:1, 144:13; 147:25;
170:11, 173:5, 175:10;
183:19
receive 58:17; 60:15;

161:5; 164:8; 190:12;
197:24
received 54:18; 164:12;
182:1; 186:14; 194:23;
203:22; 212:4
receiving 158:16;
164:11; 188:25
recent 175:23; 178:17;
206:4
recently 153:19
reception 42:11; 49:1
Recess 79:12; 117:13;
198:12; 213:3
recessed 166:5
recognize 25:17; 55:3;
114:17; 119:6; 218:5
recognized 201:2
recollect 159:5
recollection 60:2, 3;
62:2; 63:4, 7, 15, 18, 19;
81:6; 88:1; 92:19; 100:10;
106:20; 131:20, 23;
135:18, 21; 141:20; 148:8,
19; 158:3; 161:10; 165:3;
168:2, 21; 169:1, 4, 9, 10,
15; 182:21; 183:3; 186:25;
188:6, 10, 24; 189:9;
193:8; 198:6
recollections 161:13
recommend 152:25;
153:20; 206:20
recommendations
117:6
reconvene 166:5
record 4:10; 5:17, 20;
9:16; 10:6; 26:9; 30:1, 20;
31:22, 23; 36:5; 57:9, 11;
61:9; 92:22; 103:17;
110:4; 114:16, 18; 115:2;
118:3; 119:9; 120:5, 23;
121:20, 22; 122:9; 124:20;
144:23; 149:14; 151:24;
155:1, 10; 156:11; 157:1,
3, 167:3; 176:13; 177:8;
180:17; 186:3; 191:9, 20;
193:9, 10; 199:7; 200:10;
207:14; 208:14, 17; 213:7,
25; 214:9
records 42:1; 57:3, 19;
85:16, 22; 146:17; 190:24,
25; 192:3
recruit 79:17
redactions 207:16
REED 4:3, 12; 5:19;
12:12, 25; 58:15; 87:13;
117:22, 25; 123:24;
135:25; 144:21; 145:7;
149:19; 150:7; 154:9;
157:9; 167:4, 9, 19;
184:15; 185:24; 191:6;
198:17, 20; 199:9; 201:23;
202:1, 207:12; 208:20;
213:23; 223:11; 224:3
Reed's 58:5; 191:10;
198:24
Reed-that 198:16
refer 27:2, 4; 214:18

reference 48:19
referenced 123:24
referred 26:21
referring 155:15; 173:20;
178:24; 181:8; 184:1, 1;
185:10, 11, 15; 193:4
refers 168:22; 181:13
reflect 37:13; 86:6;
144:23; 157:3; 167:3;
207:14
reflected 148:1
reflecting 168:23
reflects 5:20; 124:20;
157:1
reform 83:15
refraining 144:5
refresh 168:25; 188:24;
189:9, 12
refreshed 169:9; 189:3
regard 29:11; 45:6;
76:10, 10; 215:23
regarded 78:20; 133:14
regarding 76:23, 25;
79:15; 144:16; 157:21;
191:5; 211:20; 221:14
regardless 158:23
regards 29:1; 148:3
Region 7:13
regional 7:12, 15
registration 216:4;
222:20
regular 49:24; 50:8; 52:6;
90:24; 107:7; 108:13
regularly 60:23; 181:25;
207:6
regulations 96:2; 122:5;
205:6
relate 57:3; 218:6
related 28:1, 2, 12; 39:12;
44:3; 49:10, 15; 54:25
relates 122:20
relating 28:5; 127:25
relations 14:5; 129:21,
23; 143:18; 174:25; 175:1
relationship 35:5, 6;
66:18; 84:6, 19; 180:5;
198:3
relative 200:12
relatively 13:13; 101:19;
200:6
released 182:19
relevancy 206:18
relevant 29:4, 6; 74:6;
189:21
remaining 115:13
remember 5:2; 15:19;
16:24; 18:19, 20, 22, 24,
25; 19:18, 19; 21:19, 20,
22; 27:18, 22; 28:9, 16;
37:17; 39:19, 23; 43:9, 17;
45:3; 47:19; 49:8, 10, 12;
50:9; 51:12, 16, 21; 53:24;
54:1; 59:6, 7, 10, 18; 60:1,
11, 16; 61:4, 5, 7, 8, 16;
62:1, 3, 4, 7; 67:4; 68:19;

69:2, 17, 18; 70:7, 7, 17;
71:8, 11, 16, 17; 72:2;
73:3, 3; 77:3; 78:5, 8, 9;
79:14, 16; 80:3, 3; 81:23;
82:12, 13, 13, 14; 85:20,
21; 86:8, 9; 87:1, 4, 5, 8;
89:22; 90:12; 92:15, 21,
23; 97:19; 99:4, 5, 6, 9, 11,
20; 100:9, 25; 101:11, 16,
17; 105:8; 108:10, 15, 16;
111:22; 125:22; 126:17,
20, 22, 24; 127:5, 7, 10,
14; 129:6; 133:4, 12, 12,
18, 20; 134:3, 24; 135:4;
142:7; 144:3, 7, 16;
147:20; 148:16, 23;
149:10; 152:9; 156:18;
157:13; 159:10, 13, 18;
160:18, 20, 21; 161:2, 8,
14; 162:11; 163:23; 164:3,
9, 10, 14, 14, 17; 165:25;
168:2, 3; 169:23; 170:1, 4,
6, 7, 8, 15; 173:16; 174:20;
175:5, 11, 15; 177:12;
178:8, 14; 179:3; 180:3;
181:14; 187:1, 3, 5;
188:14, 24; 190:7; 194:6,
8, 11, 16, 21; 195:15;
196:3; 197:9; 202:19, 22;
203:7, 8, 14; 204:9;
205:19; 220:25; 221:6
remember-do 126:17
remember-that 111:25
remembers 126:14
rendering 75:15
rental 190:24
rented 139:22; 143:2, 3;
215:16, 220:6
renting 215:24
repaid 105:19, 20;
108:24; 110:16, 111:5;
116:21, 127:9
replay 103:5, 106:9;
124:16, 125:15, 17; 126:6;
130:8
repayment 108:7;
111:17, 192:25
Repeat 61:19; 177:12
repeated 27:8
rephrase 73:15
replacing 123:13
reply 213:4
replenished 116:1
report 13:7, 182:19;
183:1, 213:10; 221:14
reported 13:10; 14:13,
15, 15:12
reporter 9:15; 10:5; 26:8;
110:3, 115:1, 213:6;
223:13
reports 126:21; 190:13;
220:20; 221:1, 7, 20
representation 37:14;
57:17
representatives 91:16;
118:6; 119:1, 10; 120:12;
121:10, 24; 122:6; 145:1

represented 34:16, 21,
23
representing 34:14;
35:22; 37:8; 165:12
Republican 6:19; 8:9, 10;
9:7, 8, 9; 10:10; 11:12, 16;
12:20, 21; 13:1, 2, 11;
14:24; 19:23; 20:13, 15,
19; 21:11; 22:19, 20; 23:4,
12, 14, 19, 23; 24:10; 27:1;
33:22, 24; 34:6; 40:8; 46:8,
23; 47:6; 49:16; 50:2; 60:7;
65:23; 66:1; 67:10; 69:9;
70:19; 71:2; 72:20; 80:20;
24; 81:12, 13, 14; 82:1, 9,
18; 83:2, 6, 11, 13, 17;
84:2, 3, 6, 9, 12, 13, 15, 22;
85:11; 91:25; 92:6, 7, 12,
13; 93:2, 16, 19; 95:25;
96:1, 12, 14, 17; 97:21;
102:20; 103:4; 104:17, 23,
25; 105:16; 108:7; 112:11,
19; 115:16, 22; 116:3;
121:23; 128:22; 130:8, 9;
131:3, 14, 17; 132:7, 22;
135:14; 137:9, 13; 141:10,
11, 14, 17; 142:4; 145:4, 8,
19, 21, 24; 146:15, 18;
147:4, 5; 148:24; 149:6;
160:6; 163:16; 167:17;
173:10; 187:14; 201:3, 4,
8, 12, 14; 207:1; 208:18;
209:19; 215:12, 14;
216:22; 217:10; 221:22,
25; 224:14, 15, 24
Republicans 200:14, 18,
19; 201:6, 6, 7; 204:2, 3, 8,
9, 19; 205:15; 206:9, 23;
207:3; 209:3, 8, 12; 210:4,
16, 23; 211:2, 9, 12; 215:3,
8, 17, 18, 20; 216:1; 217:7,
10, 16, 17; 218:1, 18, 18,
219:8, 23; 221:21; 222:17,
19; 223:1, 2
republics 135:1
request 54:17; 57:18, 21,
60:4; 61:18, 21; 62:5, 8;
86:13; 123:15; 198:14,
202:8; 205:21, 22
requested 9:15, 10:5;
26:8; 110:3; 115:1; 213:6
requesting 52:21
requests 54:15, 17;
58:16; 59:24; 202:11
require 59:2, 8; 181:7
required 63:16, 22
requirement 133:22
requirements 162:23
requires 175:23
requiring 63:8; 132:23
rescheduling 198:23
reside 70:23
resided 77:21
resigned 7:18; 8:2, 7, 14;
185:2, 5
resolution 206:13
respect 18:18; 19:7, 10,
14; 31:16; 41:18; 44:8;

48:3; 76:15, 17; 77:6;
172:19, 20, 22; 177:19;
179:17; 180:9
respond 181:7
responsibilities 8:22,
25; 14:22; 130:4
responsibility 132:10
rest 132:20; 150:23, 25;
213:19
result 123:15
resume 5:12; 6:4
resumed 167:10
retrieve 192:6
return 13:1; 198:17
returned 167:4
Returning 211:9
review 18:11; 36:20, 22,
24; 56:3; 197:8; 219:20
reviewed 20:21; 27:12;
36:16; 114:3; 133:3;
153:19; 219:24
reviewing 197:9; 217:4, 6
revolved 160:14
Richard 118:2; 135:16,
19, 22
Richards 118:2; 135:17,
20, 22
right 8:12; 13:7; 18:14;
21:15; 22:7, 9; 26:1; 30:2;
35:11; 36:16; 38:7; 45:15,
16, 49:14; 55:15; 56:5;
60:3, 62:18; 63:25; 65:3;
66:1; 67:17; 74:8; 79:17,
22, 24; 80:16; 83:7; 89:17;
90:7, 91:20; 102:21;
104:16; 105:3; 109:23;
117:17, 21; 123:3; 129:24;
130:13; 134:9; 141:9, 25;
146:5; 147:6; 148:12;
151:3, 17, 23, 24; 156:10;
163:17; 184:2, 12; 187:17;
188:16; 189:18; 193:1, 1;
196:8, 13; 198:8; 205:10;
208:2; 210:14; 214:13
RNC 7:14; 8:19; 9:3, 4, 23;
10:11, 12, 12; 11:3, 20, 24;
12:3, 3, 4, 7, 15; 13:8, 15;
16:3, 19; 10; 20:1; 21:6, 9,
17, 24; 22:1, 4, 23:5, 25;
26:23, 27:8, 20, 28:2; 35:5;
36:17, 19, 37:19; 38:16;
39:1, 8, 40:9, 12, 13, 17;
41:14, 42:5, 43:11, 16;
45:12, 15, 18, 46:25;
47:11, 49:13, 14; 50:13;
51:1, 24, 52:21; 53:13, 19,
23, 54:11, 56:18; 59:21;
60:4, 61:2, 13, 62:6; 63:8;
65:1, 10, 12, 15, 18, 20;
66:20, 67:20, 24; 71:5;
75:17, 24; 76:3; 79:15;
84:19, 20, 25; 85:3, 6, 15;
86:12, 87:6; 88:1; 90:21,
21, 91:18; 92:18; 93:12;
96:8, 22; 97:16; 101:7, 22,
23, 102:2, 6; 103:6; 104:8,
21, 107:22; 108:14;
110:21; 111:18; 112:3, 14;

118:20, 22; 124:17;
125:17, 19; 126:6; 127:9;
131:9, 9; 132:12; 133:21;
134:9, 13, 13; 135:6;
136:25; 137:2, 8, 21, 22;
138:4, 25; 139:3, 11;
140:17; 142:12; 143:14;
148:6, 19; 149:15; 152:18,
20; 153:5, 7, 13; 158:6;
159:22; 160:2, 19; 161:20,
23; 162:14; 165:4, 13;
170:12; 171:10; 173:22,
24; 174:13, 19; 175:13, 18;
176:1; 179:2; 180:6;
181:20, 25; 182:11, 18;
183:2, 19; 184:11, 13;
187:2; 190:19, 22; 192:21;
195:18, 25; 196:4, 10, 20;
201:18; 204:1, 15, 20;
205:4, 8; 207:2; 209:18;
211:12, 20, 24; 212:3, 4;
213:9; 215:7, 22, 23;
216:1, 4, 8, 11, 25; 218:17;
219:20; 220:20, 24; 221:2,
12, 22; 222:23; 224:15, 25
RNC's 104:1; 108:8;
148:10
RNC-anybody 196:12
RNC-124:18
RNC-NPF 195:3
RNSEC 112:10, 15;
113:9; 115:21; 116:15, 16;
117:4
road 88:12; 90:19;
127:13; 142:5
ROBBINS 4:9; 5:16, 23;
6:2, 3; 7:16; 9:11, 14, 17,
25; 10:14, 19; 12:9, 18;
17:5, 6, 11, 15; 18:5, 9, 14,
15; 20:4, 10, 12; 21:2, 3;
22:2, 5, 7, 9, 10; 24:21;
25:13, 22; 26:1, 6, 11;
29:5, 9, 14, 19, 22, 25;
30:3, 11, 15, 17, 24; 31:4,
9, 14, 19, 22, 24; 32:11,
17, 21; 33:7, 9, 14, 16, 25;
34:2, 18, 20; 35:1, 8, 10,
12, 16, 19, 22; 36:3, 7, 20,
21; 37:2, 7, 24; 38:1, 20,
24; 39:4, 40:11, 14, 15, 20,
22; 42:4, 8; 44:18; 47:14,
22; 48:15; 50:1, 6, 11;
52:10, 13, 19; 54:10, 14,
23; 55:6, 9, 12, 15, 17, 22;
56:11, 15, 20, 23; 57:1, 6,
10, 14, 17, 23; 58:6, 13,
14; 67:23; 73:12, 19, 22;
24; 74:8, 11, 17; 75:18, 22,
25; 76:13; 79:5, 11, 13;
81:2; 85:19, 23; 86:20;
87:11, 15, 20, 25; 91:5;
94:7, 11, 20; 95:2, 5, 8, 10,
17; 97:25; 98:11, 13, 14,
21; 100:15, 17, 19, 20;
101:23, 25; 102:1; 103:11,
19, 23; 104:7, 10, 15;
105:25; 106:1, 25; 107:14;
108:2, 4; 109:12, 13, 14,
23, 24; 110:2, 6; 112:21;
114:14, 20, 22, 25; 115:5;

116:8, 18; 117:12, 15, 17,
19, 24; 118:11, 15, 18, 21;
119:2, 4, 14, 18; 120:1, 5,
13, 16, 18, 22; 121:7, 11,
14, 19; 122:13, 19, 23;
123:6, 9; 124:2, 5, 6, 24;
125:1, 6, 9, 12; 126:9, 12,
16; 127:15; 128:7; 129:11,
14; 130:16; 131:21, 24;
135:23; 136:2, 6, 10, 16,
18, 21; 138:11, 16, 21, 23;
139:7, 10, 20, 23; 140:1, 9,
13, 16; 141:7; 143:7, 8;
145:2, 5, 11, 13; 146:3, 5,
6, 23, 24; 147:15, 19, 24;
149:18, 22, 23, 25; 150:6,
11, 15, 21; 151:3, 5, 9, 13,
16, 23; 152:2; 154:22;
155:6, 9, 12, 23; 156:5, 10,
13, 25; 157:2, 5, 7, 12, 15,
25; 158:17, 21; 159:3, 6,
25; 162:5; 163:3, 6, 9, 14;
166:3; 167:6, 14, 22;
168:6, 8, 14, 18; 169:6, 11,
14; 170:24; 171:1, 4, 7, 9,
25; 172:5, 10, 14; 174:7,
14; 176:6, 11, 17, 20, 21;
177:14, 15; 179:11, 12;
184:10; 185:6, 14, 16, 22;
186:5, 9, 21, 23; 187:22,
25; 189:5, 7; 191:8, 12, 15,
18, 21, 23, 25; 193:5, 9,
12, 17, 20, 22; 196:24;
198:11, 13; 199:2, 13, 16,
23; 200:4
Robin 13:22
role 16:16, 18; 17:3, 14,
16, 17, 18; 18:4, 8, 17, 20,
22; 31:15; 33:18; 41:9, 11;
46:18, 19; 49:6, 7; 88:16,
18, 21, 22; 89:25; 90:2;
131:8; 132:10; 137:14, 16;
139:11; 140:18, 21, 25;
152:15; 153:1; 160:22;
177:21; 178:4; 179:4;
180:24
role-tell 17:16
roles 140:3; 173:10,
175:8
Ron 188:1
room 55:25; 88:8;
172:13; 174:21, 22
rough 61:5, 9; 64:17, 19
roughly 37:11, 16
routinely 171:10, 11, 12;
173:22; 174:13; 183:24;
184:16; 190:17
rules 26:2; 96:2; 121:25;
122:5; 205:2, 5; 211:19
ruling 7:3; 95:6
run 35:15, 16; 79:18;
110:14; 178:10; 223:5
running 25:2; 27:14;
65:7; 83:24; 110:13;
172:20; 194:4

S

S-E-C 112:18
safe 221:11
salary 12:19, 22
same 54:20; 83:12;
95:25; 98:4, 8; 124:23;
125:3; 129:17; 166:5;
177:6, 10; 187:22; 193:15;
224:5
Sanford 47:15; 174:1, 20;
182:8; 187:6, 7
satisfaction 180:4
saw 28:4, 7; 49:1; 69:13;
81:21; 164:19; 221:11
saying 5:18; 9:8; 20:2;
22:1; 54:24; 76:9; 94:23;
98:18; 99:20; 103:17;
114:12; 116:15; 118:6;
123:24; 125:3; 165:8;
179:9
says-and 173:19
scene 185:1
schedule 198:24, 24
scheduler 47:17, 18;
71:7
School 6:7
scope 29:12, 15; 31:2, 7;
32:1; 33:12; 54:15; 55:4,
10, 22; 56:2; 57:21; 211:4;
219:5
SCOTT 4:3, 12; 47:23, 25;
145:7; 150:7; 167:9;
187:1, 7
screening 132:25;
133:21; 134:12
Scruggs 47:18; 70:22
search 56:2; 57:2, 19
searched 191:3
seats 123:15
second 5:15, 47, 18,
109:11, 23; 121:16, 126:8,
168:22; 169:3; 186:18,
187:8, 198:10; 214:17, 21;
224:2
secondary 31:25
secretary 70:21, 71:4;
182:9
Section 175:22
seed 65:7
seeing 28:16; 69:17, 18,
82:12, 14; 87:4; 168:2,
188:24
seek 12:6, 55:1, 77:5;
82:23; 85:24; 86:1,
159:15; 162:21
seek-did 162:21
seem 103:13; 138:11
segmenting 25:19
segregate 47:4, 8
select 80:9, 10
selected 80:11, 12, 12,
15, 16
selecting 80:20

selection 80:13;
Senate 102:16; 119:11;
120:9; 122:1; 150:5;
144:24; 206:13
Senator 41:4, 9, 11, 16;
206:3, 13
send 51:14; 62:6; 192:6;
216:1, 4; 221:1
senior 91:8; 197:6
sense 73:14; 78:23;
90:13, 15; 199:18
sensibilities 25:23
sensitive 33:9
sent 19:3; 28:11; 62:9;
114:2; 133:15; 152:5, 24;
153:5, 8, 12
sentence 183:22
sentiment 183:17
separate 92:17, 18;
175:18, 23; 179:2; 182:18,
25; 195:10, 19; 224:17, 21,
22
separation 93:1; 175:25;
178:19, 21
September 118:1;
127:19
series 142:3
serve 9:4; 11:2, 2; 12:3
served 9:1; 10:23, 25;
11:4; 12:16; 27:8; 134:11
serves 12:9
service 9:7; 10:11
services 13:1
serving 11:11, 20; 66:3
SESSION 167:1; 169:5
set 58:25; 59:8, 23; 65:25;
66:19; 69:18; 82:18, 20;
92:22; 93:15; 98:11, 12,
124:24, 25; 141:4, 9;
142:19; 143:21; 160:8,
211:19; 224:21
set-up 177:2
setting 137:14; 140:18;
142:20; 153:2; 163:13
seven 163:17, 19
Several 84:16, 23;
116:20; 119:23; 123:18,
129:1; 177:10
shambles 219:19
shape 154:3
shared 181:10; 186:7, 10
SHAW 58:5, 8; 118:13,
16, 19; 136:6, 17; 149:23,
150:3; 151:5, 12; 168:12;
186:2, 6; 193:4; 199:8;
207:14, 20; 213:25; 214:5,
8, 13; 223:11; 224:9
sheet 20:24
sheets 86:14
Shepherd 222:8
shop 192:17
short 153:4; 200:6, 12;
220:3
shorter 73:16
show 87:15, 16; 117:25;

136:24; 137:3, 14, 25;
138:7, 8, 24; 139:2, 25;
140:18, 22; 141:4; 143:13;
144:18; 165:17; 198:1;
206:18; 207:9
showed 120:2; 141:25;
192:24
showing 140:6; 194:19;
218:8; 219:6
shows 137:19; 139:15
side 16:21, 23; 115:8
sides 165:9
sign 19:11, 15; 20:19, 23;
145:20
sign-off 19:5, 5, 20:24;
60:21
signature 145:12; 146:7
signed 19:20, 23; 20:2, 3,
5, 5, 7, 9, 11, 16, 21, 24;
59:1; 145:7, 14; 147:3, 17,
21; 179:24
significant 101:19;
115:11
signing 16:13; 145:23
similar 202:10
simple 118:13
simply 18:5, 25:23; 56:5;
120:4; 127:5
single 28:22; 104:2, 3
sit 63:7; 161:4; 198:25
sitting 149:4
situation 180:25
six 28:10, 19; 29:13; 30:5;
33:18, 34:23; 37:9; 140:7;
158:19, 184:18
size 101:21, 24, 24
Skiamberg 200:5, 11, 25;
201:22, 25; 202:5, 15;
203:25; 205:25; 206:8, 15,
21, 22; 207:10, 19, 22, 24;
208:2, 5, 9, 12, 16, 24;
209:1, 25; 210:3, 9, 14, 20,
22, 211:7, 8, 16, 18, 23;
212:1, 9, 11, 13, 18, 24;
213:4, 11, 21; 214:4, 7, 9,
12, 14, 16, 21, 24; 215:5,
6, 216:11, 14, 19, 21;
217:4, 6, 8, 9, 218:3, 9, 13,
16, 20, 219:2, 7, 11, 17,
220:23, 221:4, 9; 222:4,
223:9
slow 180:12
slowness 180:22
small 113:14
smart 165:17
So-and 113:7
social 48:18
soft 111:11, 14; 116:6,
123:13
sole 9:4, 199:11
solely 91:18
solicit 224:25
somebodies 51:9
somebody 51:5, 6, 10,
21, 23, 52:4, 24; 63:12;

73:3; 76:23; 81:78:2,
10; 79:5; 80:4; 91:21;
102:2, 2, 4; 106:3, 4, 7, 13;
113:7; 126:2; 127:7;
129:4, 17; 132:3; 139:32;
140:7; 149:5; 154:1;
160:19, 19; 165:1, 23;
192:6; 196:18; 219:14
somebody's 56:9
somehow 136:16
someone 50:13; 144:14;
203:9, 9, 12, 13, 15
somewhere 81:7; 190:6
something 12:7; 17:23,
25; 19:20; 22:14, 16; 24:3;
28:17; 52:2, 3, 3; 56:7;
64:23; 94:11; 112:12;
119:9, 13; 133:2; 149:5;
160:23; 173:15, 17;
186:12; 189:23; 192:4;
199:22; 201:7, 9; 206:1
sometime 45:3; 102:9;
103:1; 105:7; 125:22;
127:19; 134:19; 162:11
sometimes 69:6, 18;
172:20, 21
somewhere 27:19; 77:3;
151:21; 190:23; 191:2
sophisticated 114:1
sorry 13:23, 25; 39:21;
66:9; 67:13, 13; 68:11;
78:25; 100:21; 137:2;
171:25
sort 32:2, 6, 12; 52:14,
14; 58:3; 79:3; 107:1;
199:19; 224:1
sought 93:1; 159:18
sounds 181:14
source 28:1; 73:9, 9;
75:9; 131:25; 132:2;
158:5; 207:18
sources 71:19; 77:15;
93:11, 14; 95:12, 20; 96:7;
121:4; 156:16, 20; 157:10,
19; 158:2, 23; 159:8;
168:25; 169:17, 19, 21, 25;
224:25
sources-that 157:18
Soviet 135:1
speak 30:19; 50:18; 51:1;
52:25; 66:13; 88:25; 89:3,
21; 90:4, 20; 124:15;
128:21; 138:14; 192:18;
197:22; 205:8, 12
speaking 89:7, 22
speaking-I 90:12
speaks 52:14; 208:25;
215:4
specific 53:15; 61:4, 14,
18; 64:20; 66:19; 71:11,
17; 76:11; 78:2; 86:15;
125:15; 126:22; 147:18,
21; 148:3; 157:21; 161:13;
164:2; 194:8, 14; 203:14
specific-I 61:8
specifically 23:10;
39:10, 11; 54:1; 72:2;

76:23; 85:25; 133:18;
170:7, 8; 175:5; 195:15;
197:9
specified 30:9; 31:12
specify 218:23
speculate 25:18
speculating 179:10
speech 122:20
spelling 14:7; 15:20;
81:21
spend 109:8; 110:10
spending 85:5; 217:19
spent 61:7; 115:16;
183:21
spirit 73:19
split 113:18
spoke 44:15; 50:13; 92:8;
98:6, 6; 111:4; 128:6, 9;
203:12; 205:13; 222:12
spoken 36:9; 40:9, 11,
13, 17, 23; 41:21; 42:9, 15,
18, 21, 24; 43:2, 4, 6, 18,
21, 23; 44:8, 12
spokesperson 43:15
spokeswoman 43:11, 13
spurred 78:5
St 6:6; 25:2; 26:13, 18;
75:18, 20
staff 6:22; 8:1; 13:11;
15:3, 15; 16:25; 88:1;
90:21, 24, 25; 91:3, 6, 7, 8,
17, 18; 92:16, 21; 93:6, 8;
99:12; 106:16; 107:2;
113:2, 24; 119:16; 120:9;
141:15; 154:5; 171:11;
173:22; 174:13; 176:14;
181:12; 182:3, 6; 183:2,
13, 14, 18, 23; 184:8, 11,
13; 196:1
staffs 14:15
stage 199:9
stages 176:8; 177:2
stamp 151:8
stamped 144:18
stand 167:10
standard 51:17, 25;
118:23; 189:13
standards 101:18
stands 112:20; 120:16
staple 150:25; 151:1
stapled 150:20; 151:21
start 45:1; 65:23; 81:9,
11; 169:4, 10
start-up 49:21
started 8:17; 38:9, 22;
85:6; 197:12, 14; 208:8
starting 17:6; 79:25;
127:22
starts 79:2; 164:18
startup 84:14, 24
state 4:10; 15:8; 16:10;
19:8; 46:15; 112:11, 19;
120:5; 140:8; 148:15, 22,
24; 149:6, 8
stated 24:11

statement 105:24;
110:17; 163:2; 183:23
statements 58:1
States 72:1; 74:22; 78:24;
120:11; 133:23; 134:2;
211:21
stating 132:24
stationery 118:2; 152:17;
208:18
status 93:15; 110:18;
170:13; 182:12; 189:13;
190:11
stayed 8:13
step 17:14; 31:21; 33:25;
25; 62:12, 16
steps 63:2; 132:8, 11;
153:21; 163:21; 170:12
still 43:12; 71:2; 142:8;
204:24
stipulate 120:2
stone 55:23
stop 166:1
stops 164:18
storage 55:25; 190:21
stored 190:23
straight 92:23; 114:1
straight-out 195:4
straightforward 117:2
strategic 88:18, 21
strategies 170:6
street 44:6
stretch 198:9
strike 134:16
strong 181:6
structurally 16:7
structure 13:15
studio 137:18, 18;
139:22; 141:4; 143:2, 5;
144:11
studio-I 142:18
stuff 49:13
subject 40:4; 71:8, 11;
14; 75:3; 77:21, 25; 88:2;
97:18; 109:8, 10; 161:6,
173:5
subjects 82:22
submit 132:20; 202:6,
204:6
submitted 202:8, 10;
203:4, 6, 205:6
submitting 204:9
subpoena 54:18
subpoenaed 5:20
subsequent 38:12
subsequently 141:22
subsidiaries 72:1, 9, 11,
22; 73:1, 8; 74:3, 23; 75:6;
78:16, 17, 24; 96:21;
154:6, 12; 155:19; 156:17;
160:10, 12; 161:15, 22;
162:15, 19
subsidiaries-oh 161:18
subsidiary 154:17, 23;
158:8

subsidiary-are 158:24
substantive 32:8
success 80:1
suggest 67:13; 110:23
suggested 110:25;
178:20
suggesting 157:17
summary 183:1
summer 92:4; 201:15
Summit 12:14
superficial 219:12, 19
superfluous 151:2
supervise 139:11;
142:20
supervised 137:17, 22
supplied 65:7; 85:2, 6, 11
supported 82:22
supposed 57:4
supposition 130:11
Sure 5:16, 22; 6:2; 10:16;
16:21; 17:9; 18:3; 19:19;
23:10; 25:25; 27:4; 31:22;
33:10; 35:10, 12; 37:12;
45:16; 50:24; 52:18;
55:12, 20; 58:6; 76:20;
79:5, 11; 80:14; 81:4; 82:5;
85:7, 9, 19; 89:2, 19, 20;
90:8, 8, 9; 102:4; 103:16,
24; 111:20, 22; 112:4;
117:11; 128:17; 138:21;
140:3; 166:3; 173:7, 9, 11;
174:12; 185:14; 189:18;
191:18; 194:2, 12, 16;
195:1, 5, 6, 8, 22; 197:4;
198:11; 199:3, 6, 200:23,
24; 224:19, 20
sure-I'm 54:19
surplus 116:11, 13;
117:3, 4
surprised 71:16; 93:5;
151:11; 197:10
suspend 200:7
Suzanne 47:18; 70:22
sworn 4:5, 24; 5:4, 8, 25;
167:10

T

tablet 55:23
Taiwan 101:5
Takahashi 222:6
talk 31:15; 40:4, 41:24;
50:12; 51:14; 57:12;
62:13, 23; 90:10; 146:21;
151:18, 19; 153:16;
160:15; 191:7; 198:23;
218:25; 219:3
talked 22:14; 28:24; 32:5;
38:21; 42:6, 6; 43:10;
50:16; 81:17; 129:11;
130:14; 143:23; 160:17,
20
talking 11:9; 17:4; 18:7;
22:23; 23:17; 69:20;
88:24; 91:2; 110:21;

113:7; 145:6; 173:25;
174:6; 216:17
tank 23:21, 22, 23; 25:8;
10; 65:23; 79:25
target 165:2
targeted 123:15
tasks 79:25
tax 83:15; 84:20; 93:15;
175:22
tax-exempt 170:13;
178:7; 182:12
team 26:17; 66:11; 92:18;
157:17; 216:11, 17, 22
technical 114:21
telephone 47:21; 127:14
television 110:7; 136:24;
137:3, 25; 138:7; 139:25;
141:4
telling 53:17
tells 172:6
tens 122:16
tenure 26:22
term 153:4; 200:12
terms 25:19, 20; 109:14;
143:5; 200:18; 206:23, 25
testified 4:6; 124:21;
128:5; 167:11; 169:22;
189:8
testify 4:17; 10:15; 140:5
testifying 4:21; 26:2
testimony 4:13, 24; 5:4;
8, 25; 10:18; 25:24; 38:6;
106:19; 127:24; 174:8, 12,
12, 17
that-draw 103:15
that-I 150:24; 168:4
that-is 13:5
that-or 148:9
that-the 13:8
that-to 125:16
that-under 106:19
the-he 68:22
the-I 16:12; 92:4
the-that 112:13
the-with 31:15
the-you 134:8
the-your 69:7
theme 88:10; 142:5
themes 82:21
themselves 74:5; 162:17
therefore 96:5; 133:15
thereof 109:21
these-what 172:15
they'd 205:2
They're 153:3; 167:23;
I'm 25; 171:1, 2
think-as 199:5
think-I'm 5:18
thinking 54:19; 67:15;
91:7; 135:2; 182:6; 187:23
third 123:10; 145:6;
170:20
this-these 148:2

Thompson 206:13
Thompson's 206:4
though 85:9; 103:13;
115:20; 175:18; 192:16
thought 45:17; 67:14;
70:1; 71:22; 72:4; 78:11;
80:4; 83:9; 89:12; 96:23;
99:12; 138:17; 152:14, 22,
25; 154:7, 10, 14, 15;
160:13, 21, 23; 162:4, 16;
163:9, 11; 168:6; 182:20;
184:20
thoughts 153:3
thousands 122:17
three 5:2; 8:2; 15:24;
44:15; 48:17; 54:19; 70:7;
73:16; 98:8; 108:5, 16;
173:13; 221:18
threefold 121:21
throughout 15:3, 11;
26:21, 22; 50:9; 106:17;
108:13; 194:22
throw 70:11; 189:24
throwing 190:17
thrust 222:22
ticket 102:17
time-as 50:25
times 5:1, 3; 19:17; 30:16;
49:20; 50:10; 53:3, 25;
98:8; 129:1; 155:2;
158:20; 171:13; 180:1;
184:21; 185:8, 9, 18, 19;
222:11
title 88:11; 130:3; 141:5;
152:9; 183:14; 184:9
titled 214:10
to-he 184:1
to-let 155:15
to-they 154:7
to-you 42:24
to-day 15:1
today 15:17; 17:19; 28:6;
32:23; 33:2; 34:14; 36:15;
90:1; 198:15; 200:7;
223:15, 23; 224:3
today's 77:6
together 137:25; 139:12;
13; 141:4; 150:20, 25;
151:1; 153:23; 183:9, 21
together-they 150:13
Tokyo 209:18
told 22:20; 23:4, 25; 40:1;
42:1; 90:1; 102:3, 10;
127:16; 131:4; 132:2;
158:9; 161:14; 163:10;
165:23; 173:17; 175:20
Tom 6:12; 8:3; 15:16, 18
took 28:2; 82:14; 87:1;
134:17, 20; 135:2; 165:14,
16; 224:20
top 207:8
topic 29:18
Totally 22:9; 55:16; 96:3;
212:8
touch 48:3; 135:12

touched 44:3
town 8:18; 49:4; 75:12;
143:18; 144:10; 196:16
Toyota 72:2, 23; 78:3, 10,
14, 22; 98:6; 99:22;
157:21; 160:14, 15, 17
traditional 127:22
transaction 165:10;
215:18
transfer 66:23
transfers 221:19
transmitted 21:10
transpired 13:5
trap 98:9
travel 46:14; 195:20
traveled 14:23
traveling 47:16; 195:14,
17
trick 140:4
tried 148:17
trip 134:20, 23; 135:2, 5
trips 134:16; 195:12
trotting 208:7
True 104:7
try 53:4; 73:15; 79:17;
98:9; 140:4; 177:12
trying 102:15, 20;
103:14, 17; 105:2, 15;
106:13; 134:25; 153:20;
176:19; 205:20
TU 188:1
turn 31:20; 140:10, 11;
170:17; 214:25
turned 132:18; 183:1
turning 174:1
TV 137:14; 138:24; 139:2;
140:18, 22; 141:5
twice 54:5; 171:20;
205:13; 222:13, 14
two 5:2; 7:11; 18:1; 27:7;
32:2; 36:11, 13; 38:5, 6;
50:20; 73:16; 79:2, 9;
92:17; 123:22; 134:9;
150:13, 14; 151:15, 16, 17,
20; 152:3; 178:21; 184:24;
201:13; 205:15
two-year 12:2; 50:5;
68:17; 82:25; 172:12
type 51:16; 79:17, 23, 24;
88:24; 93:5; 94:25; 154:8;
205:3
types 109:15, 18; 177:20
typically 58:17, 23; 59:2;
69:15
typist 47:20

U

U.S 154:6, 17; 158:8;
160:9; 161:15
ultimate 89:16
ultimately 24:13; 51:6;
88:15
unclear 186:20

uncomfortable 125:10
under 4:18, 21; 5:25;
25:25; 27:2; 32:3; 36:3;
65:15, 17; 73:22; 74:9;
76:2; 91:20; 106:4; 167:6;
7; 175:21; 182:17; 224:4
underlinings 170:22
underscore 182:17
understanding—I'm
73:25
understood 9:4; 66:3;
80:5, 5, 5; 82:7; 93:16, 19;
96:1; 97:1; 107:1; 175:17
undertaken 100:8;
108:21; 182:21
undesirable 65:5
unequivocally 181:10
unfair 177:8
unfortunately 200:12
Union 12:10, 11, 11;
134:21
United 72:1; 74:22;
78:23; 120:11; 133:23;
134:2; 211:21
University 6:6
unless 30:8; 31:12;
38:11; 121:1; 122:18;
190:1; 219:6
unlike 84:10
unreasonable 103:13
up 17:17, 19; 51:15; 58:3;
65:7; 66:19; 68:22, 23;
69:21; 71:14; 75:3, 4;
79:25; 81:9, 11; 82:20;
89:18, 19; 91:18, 20;
92:21; 93:15; 95:5; 97:18;
19; 102:17; 110:19; 116:1;
117:1; 123:14; 127:21;
128:10; 133:3, 7, 15;
137:14; 140:18; 141:4, 9;
142:19, 20; 143:21;
144:16; 153:2; 160:8;
163:13; 173:15, 15, 16, 17;
180:15; 184:3; 187:21;
192:3; 194:4; 198:9;
202:18; 208:6; 212:22;
224:21
upon 94:5
upset 198:20
upstate 6:7
Urban 7:25
use 51:17; 84:1; 104:23;
25; 105:22; 118:25;
122:10; 141:14; 145:1;
201:11, 16
used 64:13, 16, 18;
112:5, 10; 113:10, 12, 20,
21; 114:4, 6, 13; 115:14,
15, 22; 121:23; 123:14;
130:8; 131:2; 133:19;
139:22, 24; 141:18, 22;
142:20; 143:1, 5; 190:20
useful 57:1; 117:16;
136:13; 138:18
using 122:2, 7; 221:20
Usually 53:1, 3, 6, 11, 16;
69:2; 71:12; 91:20; 171:13

utilize 121:3, 8; 121:5
utilize—let 121:5
utilized 75:14; 76:6, 14,
17; 136:15; 143:9

V

vague 109:22
value 104:11
variance 94:15
variety 12:13
various 18:3
verbally 58:20; 62:18
versus 139:6
vice 134:21
victories 137:9
view 55:3; 56:22; 94:25;
122:2; 137:7; 181:6;
218:3, 5
viewed 56:18; 90:17;
163:3
Virtually 170:21
vision 81:21
voiced 183:20
void 83:4
Volcansek 123:12;
124:11; 197:21
voluntarily 5:19, 21;
73:21; 167:4; 198:21;
199:6, 11, 17; 200:2; 224:4
volunteer 40:2; 183:2
volunteered 183:8
voter 216:4; 222:20, 21

W

w/Scott 188:2
wait 57:12; 169:3; 199:25;
210:6
walking 191:13
wanted—I 150:3
was—as 179:3
was—he 130:20
was—of 76:5
Washington 7:12; 80:6
wasn't—there 144:7
waste 191:10
water 97:3
Waterhouse 217:3
way 10:9; 17:14; 30:9;
39:11; 44:3; 47:4; 49:10;
56:12; 60:18; 73:17;
75:11, 12; 80:6; 90:24;
93:15; 96:16; 98:5; 120:8,
121:6; 124:3; 142:20;
143:10; 152:18; 155:16;
179:20; 183:15; 196:19,
20; 212:16
ways 171:7
wearing 46:25
week 112:2
weekly 91:8

weeks 36:13; 37:9, 9;
38:6; 48:17; 124:8; 184:18
WEINSTEIN 5:14, 17;
6:1; 7:5; 9:8; 10:7; 12:8;
17:1, 4, 8, 13, 24; 18:12;
20:2, 8, 23; 21:23; 22:3, 6;
24:19; 25:11, 16, 25; 26:5;
28:10; 29:4, 7, 11, 17, 21,
23; 30:7, 13, 22; 31:1, 5,
11, 17, 20, 24; 32:12, 18,
22; 33:1, 13, 15, 23; 34:17,
25; 35:3, 24; 36:6, 18, 25;
37:4, 8, 22; 38:18; 39:2;
40:2, 11, 19; 42:2; 44:14;
47:12; 49:25; 50:5; 52:9,
12; 54:8, 12, 17; 55:2, 8,
10, 13, 16, 18, 24; 56:14,
16, 21, 24; 57:4, 9, 12, 16,
22, 25; 58:9; 67:8, 12, 22;
73:10, 14, 21, 23; 74:6, 10,
14; 75:17, 20; 76:8; 79:7;
80:25; 85:17; 86:18;
87:18; 91:2; 94:4, 8, 12,
18, 21; 95:4, 7, 14; 97:24;
98:2, 12, 18; 100:14;
103:9, 12, 16; 104:5, 8, 12,
18; 105:24; 106:23;
107:12, 25; 108:3; 109:12;
112:18; 114:9, 12, 15, 16,
21; 116:4, 15; 117:14, 16,
18, 20; 118:3, 24; 119:7,
16, 21; 120:4, 15, 17, 19;
121:1, 8, 16, 21; 122:15;
123:5, 23; 124:4, 18, 25;
125:2, 7; 126:7, 10, 15;
127:12; 128:4; 129:10;
130:11, 131:19; 136:13;
138:10, 11, 13, 18; 139:5,
18, 21, 23, 24; 140:1, 6,
11, 15, 141:1, 142:25;
144:23, 146:2, 4, 21;
147:18; 150:9, 12, 17, 22;
151:18; 154:21, 24; 155:8,
11, 20; 156:2, 8, 22; 157:1,
3, 6, 11, 23; 158:15, 19;
159:1, 23; 162:3; 163:1, 5,
8, 10; 166:1; 167:3, 7;
168:4, 7, 10, 15; 169:3, 7;
170:22, 25; 171:2, 6, 23;
172:9; 174:4, 11; 176:5, 9,
12, 18, 177:4, 179:9;
184:6, 185:3, 10; 186:12,
187:20, 24; 189:2, 6,
191:4, 10, 13, 16, 19, 23;
193:11, 15, 18, 196:22;
198:9, 19, 199:5, 14, 17,
24; 200:1, 9, 21, 201:22;
202:2, 14, 203:24, 205:25;
206:10, 16, 207:23, 25;
208:3, 6, 11, 21, 25;
209:21, 23, 210:1, 6, 10,
15; 211:3, 14, 22, 212:7,
10, 12, 19, 213:2, 20,
214:11, 20, 215:4, 216:10,
17; 217:2, 5, 25, 218:5, 11,
14, 19, 23, 219:4, 10, 13,
220:22, 221:3, 8; 222:2
well—notations 167:24
were—that 96:6
weren't 52:18; 67:7; 83:9;
134:5; 181:23; 190:20

Westner 140:5
Westner—strike 138:5
What's 18:20; 21:19, 21;
32:6; 106:24; 110:1;
114:19; 117:25; 122:25;
129:15; 169:13; 177:17
whenever 38:9, 21;
176:18; 195:17
Whereupon 4:2; 166:4;
167:8
Whom 210:6, 6, 6
whole 12:13
wholeheartedly 212:18
whose 51:19; 88:4;
106:17; 146:10; 167:25;
170:22
why—why 177:5
wids 27:13
wife 28:23; 30:5
William 4:12; 48:5;
205:12
willing 120:2; 198:15
win 117:7
winning 15:4
winter 201:15
wire 66:23
with—or 188:2
withheld 56:13, 14, 17,
21
within 21:11, 16; 30:9, 11;
33:11; 54:15, 25; 55:4, 10,
22; 56:2, 5, 18; 57:20;
152:18; 210:8
without 13:14; 19:20;
50:20; 54:23; 62:10; 63:2;
77:10; 82:3; 86:13;
157:10; 199:3; 223:16, 23
witness 7:6, 7; 18:7, 10;
20:11; 21:1; 22:8; 24:20;
25:17; 26:4, 10; 30:2, 8;
23:31:3, 6, 11, 18; 32:3,
23; 33:8; 34:19; 35:17;
37:4, 25; 38:21; 40:13, 21;
42:5; 44:15; 47:15; 48:12,
14; 50:7; 52:16; 74:7, 16;
75:24; 76:21; 87:19, 23,
24; 94:23; 95:15; 98:3, 9;
100:16, 18; 103:11, 19, 21;
104:14; 107:13; 109:17;
110:5; 112:19; 114:11, 15;
115:3; 116:16; 118:7;
122:11; 125:4, 11; 127:13;
128:5; 129:12; 131:20, 23;
136:5; 138:14; 140:2, 14;
141:3; 143:1; 145:10, 12;
147:13, 14, 20; 149:21;
150:10; 151:15; 154:24;
155:2, 3, 22; 156:2, 3, 9,
22; 157:13; 159:4, 24;
163:6, 11; 167:21; 168:16;
169:13; 172:1, 11; 174:5;
176:7; 177:7; 184:7;
185:4, 15; 186:1; 196:23;
199:25; 200:23; 202:3;
206:20; 208:23; 209:22;
210:2, 11, 18; 211:6, 17,
24; 212:8, 22; 213:8;

216:13, 20; 217:7; 218:25;
222:3
witness—if 210:11
witness—we 35:4
witnesses 26:2
woeful 90:25
woman 47:17; 143:19
wonder 14:18
wondered 191:22
wondering 150:4
word 9:18; 10:3, 20;
56:21; 65:3; 83:8; 89:13;
90:7; 105:22; 114:4;
124:2; 155:4, 13; 170:20;
219:9
words 52:13
work 5:5, 9; 6:10, 16;
7:20; 8:3, 15; 11:6, 8, 22;
16:2; 24:16; 27:21; 35:5;
41:13, 19; 45:6, 13, 19, 24;
47:5, 5; 49:15, 18; 51:15;
66:11; 71:2; 88:8; 179:25;
182:3; 187:10; 199:2
worked 6:14, 19; 7:2, 8;
14:23; 15:14; 16:4; 39:19,
22; 45:17; 49:19; 52:4;
68:18, 22, 23; 80:6;
132:16; 183:7
working 11:15; 12:24;
106:3, 5; 123:7; 187:1
works 10:9; 39:16; 49:4;
75:12
worth 84:16, 23
would—I 107:18; 196:17
write 78:6; 81:23; 132:19
writing 59:24; 60:11;
63:8, 16; 64:10; 213:12
written 25:1, 4; 59:2, 8,
15; 60:8, 15, 22; 61:18, 21;
62:5; 63:20; 69:20; 81:25;
86:24; 152:19; 178:16;
188:25; 203:6, 7; 204:6;
214:23
wrong 38:11; 48:14;
67:14
wrong—and 121:2
wrong—is 138:7
wrong—that 38:4; 121:2
wrote 77:9; 155:16;
157:17; 161:3; 179:6

X

X 203:10
Xeroxed 186:19

Y

yeah 8:24; 11:1; 12:4;
13:6; 17:6; 21:5; 33:7;
45:20; 78:19; 101:20;
103:1; 107:3, 16; 111:19;
125:1; 127:17, 23; 145:15;
147:19; 148:25; 149:8;
163:18, 20; 164:21;

178:14; 180:13; 190:23;
192:9; 194:3; 195:7, 19;
201:20; 202:8, 12; 204:7;
205:17, 17; 222:11
year 6:23; 8:17; 43:7;
44:12; 47:18; 48:6; 49:2;
71:6; 82:25; 100:15;
113:18; 179:24; 184:23,
24; 185:5, 7, 12, 12, 17;
201:20, 21; 202:4; 203:24;
204:5; 205:10
years 6:23; 8:2; 23:1;
27:7; 28:9; 77:3; 98:25;
134:9; 184:24; 185:11, 11;
190:25; 204:1
Yesterday 36:13; 38:5
York 6:7
you're--no 216:16
you've--well 86:18
you--and 162:12
you--any 187:1
you--how 218:6
you--I 206:8
you--was 137:7
you--you 89:22
young 68:18; 101:1, 3, 4,
7; 102:3, 10, 11, 24, 24;
106:8, 8; 111:15, 16;
123:16, 19; 126:22, 23;
132:3; 135:20, 20; 183:7;
197:18, 18, 20, 20, 21;
201:6; 204:2; 215:17;
218:17; 219:23
your--isn't 104:11
yours 10:18, 26:1;
117:16; 170:25; 171:2

Z

Zero 41:20